UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 0 8 2015

CERTIFIED MAIL #70091680000076692212
RETURN RECEIPT REQUESTED

REPLY TO THE ATTENTION OF:

Mr. Joe Carruth
Environmental Manager
WM Mercury Waste Management, Inc.
21211 Durand Avenue
Union Grove, Wisconsin 53182

Re: Notice of Violation
Compliance Evaluation Inspection
WID 000 000 356

Dear Mr. Carruth:

On February 14, 2013, a representative of the U.S. Environmental Protection Agency inspected the WM Mercury Waste, Inc. facility located in Union Grove, Wisconsin (WMMWI). As a treatment and storage facility, WMMWI is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq*. (RCRA). The purpose of the inspection was to evaluate WMMWI's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by WMMWI, EPA's review of records pertaining to WMMWI, and the inspector's observations, EPA has determined that WMMWI was not in compliance with the hazardous waste treatment, storage and disposal requirements of Chapters NR 660 to 679, Wisconsin Administrative Code and/or the conditions of the August 18, 2011 operating license, plan approval and all subsequent modifications. EPA has identified noncompliance with certain licensed conditions by WMMWI as of the date of the inspection in the following paragraph, below.

Failure to comply with the facility's license requirements and conditions as required by s. 670.032 Wisconsin. Administrative Code. The site inspection showed the facility was out of compliance with license condition number 27 and 28, respectively: (1) License Condition#27 - Placards shall be used to clearly identify the separate storage areas (S-1, S-2, S-3,…S-15) and for the different types of wastes stored, such as poisons, reactive, corrosives, ignitable, PCBs, nonhazardous waste, etc.; and (2) License Condition#28 - The identity and location of all stored hazardous waste shall be known throughout the storage period.

During the inspection, as observed by EPA, and after the inspection, as documented in an email to EPA on March 1, 2013, you took certain actions to establish compliance with two license conditions. Based on the information received from WMMWI on March 1, 2013, EPA is not

planning additional enforcement actions based on this inspection at this time. This letter does not limit the applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates WMMWI's cooperation.

If you have any questions regarding this letter, please contact Ms. Cindy Dabner of my staff, at dabner.cindy@epa.gov or at 312-886-5890.

Sincerely,

Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Michael Ellenbecker, WI DNR, Michael.Ellenbecker@wisconsin.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR8J
77 WEST JACKSON BLVD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: WM MERCURY WASTE, INC.

EPA ID NUMBER: WIR 000 000 356

ADDRESS: 21211 Durand Avenue, Union Grove, Wisconsin 53182-9711

DATE OF INSPECTION: February 14, 2013

EPA INSPECTOR: Cindy Dabner
Environmental Scientist

PREPARED BY:

Cindy Dabner
Compliance Section 2

DEC 24, 2014
Date

ACCEPTED BY:

Julie Morris, Chief,
Compliance Section 2

12/30/14
Date

Purpose of the Inspection

This inspection was an evaluation of WM Mercury Waste Inc.'s compliance with hazardous waste regulations found at Wisconsin Administrative Code § Natural Resources and Title 40 of the Code of Federal Regulations (40 CFR), Parts 260 through 279. Inspector Cindy Dabner of the U.S. Environmental Protection Agency Region 5 conducted the inspection. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). WM Mercury Waste Inc. operates a licensed storage and treatment facility.

Participants

U.S. Environmental Protection Agency-
Cindy Dabner, U.S. EPA Inspector U.S. EPA Region 5
dabner.cindy@epa.gov
312-886-5890

Representatives of WM Mercury Waste, Inc.

Joseph Carruth, Environmental Manager
jcarruth@wm.com
1-800-741-3343
Fax 262-878-2699
Cell 262-349-5205

Patrick Baskfield, Senior Manager Operations
pbask@wm.com
262-878-2599
Cell 414-418-2570

Introduction

On February 14, 2013, Inspector Cindy Dabner arrived to the site at approximately 9:45 am and departed at 4:30 pm. Inspector Dabner presented her federal identification and explained the purpose of the visit was to conduct a hazardous waste inspection.

During the opening conference, Inspector Dabner inquired about the required safety measures to conduct during the inspection tour. No special safety measures were mentioned. The typical standard safety equipment was required which included steel toed shoes and hard hat.

Inspector Dabner discussed during the opening conference, confidential business information (CBI) and the use of a camera during the inspection. WM Mercury Waste Inc. did not make any CBI claims on: (1) the information provided to the inspector; or (2) photographs taken during the inspection. Inspector Dabner provided a Small Business Resources Information Sheet and Pollution Prevention Brochure to Mr. Carruth.

Site Description

WM Mercury Waste, Inc. (WMMWI) employs approximately 22 employee and operates a 35,000 sq. ft. mercury recycling facility west of Union Grove, Wisconsin. WMMWI is a mercury recycling facility that is also regulated as a licensed hazardous waste storage and treatment facility. WMMWI receives mercury-baring hazardous waste streams from clients in the U.S. and Canada. WMMWI provides one of the largest mercury-baring processing capacity in the United States. The facility capacity includes:

(1) Stationary Retort Processing-

a. WMMWI's mercury recovery units includes four stationary retort furnaces, one continuous-feed retort furnace, and four tank treatment systems. The retort systems handles up to thirty 55-gallon drum equivalents per batch process and is regulated under a legitimate reclamation recycling exemption of s. NR 661.02(3)(c) Wisconsin Administrative Code.

b. Waste waters are treated on-site using a wastewater treatment system consisting of two 500-gallon treatment tanks (Treatment Tanks#1 and #2) and two 3,000-gallon storage tanks (Storage Tank#1 and Tank#2). The wastewater treatment system is a licensed hazardous waste storage and treatment unit.

(2) Continuous Flow Retort Processing- WMMWI's technologies are designed for flowable solids that includes contaminated soils.

(3) Mercury Distillation and Resale- WMMWI also offers mercury purification for resale of the recovered mercury.

(4) Mercury Distillation and Resale – WMMWI also offers mercury purification for resale of the recovered mercury.

WMMWI is located on the south side of State Truck Highway (Durand Avenue) in the Town of Dover, Racine, Wisconsin. The WMMWI Union Grove facility is comprised of four buildings. The buildings include the East Building, West Building, South Building, and the VaporLok Building. There are several large employee parking areas around the building structures, and three storm water retention ponds are also located on the site.

Waste Generation

WMMWI operates as a Universal Waste Large Quantity Handler and stores lamps for off-site shipment. The bulk of the hazardous waste generated at the facility is from mercury recovery activities. The main waste streams generated at WMMWI consist of the following:

Process	Waste Name	Estimated Quantity Annually	Analysis/Waste Codes
Mercury Reclaim/Retort Processing	Retort Ash	288 tons	TCLP Mercury D009, D004, D006, D007, D005, D002, D008, P092, K106, K071
Mercury Reclaim/Retort processing	Retorted Phosphorus Powder	432 tons	TCLP Mercury D009, D004, D006, D007, D005, D002, D008, P092, K106, K071
Lamp Crushing	Glass Light Bulbs	1039 cubic yards	TCLP Mercury D009
Consolidation at TSDF	Mercury Contaminated Debris	5 drums	D009, U151

Typical Waste Streams at WMMWI

Fluorescent lamps; calcium phosphate powder; metallic mercury; mercury switches; mercury relays; dental materials; batteries; mercury in glass; activated carbon/graphite; mercury batteries; PC boards; ignition tubes; mercury in soil; debris; regulators; crushed lamps lab pack; COD solution; mercury in water; ballasts; filter cake; nickel-cadmium batteries; lead acid batteries; alkaline batteries; silver oxide batteries; mercury in metal; COD solutions (vials); bulk solid comps for retort; bulk liquid comps for retort; sludge for retort; lithium batteries; magnesium batteries for landfill; spent electronic equipment; NiCad batteries; television sets; non-PCB ballast; magnesium batteries for recycling; potassium brine sludge; non-TSCA capacitors; and high intensity discharge lamps.

Approved Waste Codes at WMMWI

D001; D002; D003;D004; D005; D006; D007; D008;D009; D010: D011; D012; D013;D014; D015; D016; D017;D018; D019;D020; D021;D022;D023; D024;D025;D026; D027;D028;D029; D030;D031;D032; D033;D034;D035; D036;D037: D038; D039; D040; D041; D042; D043; D071; D106; D151; and P092.

Site Tour

The inspection started in the West Building. The inspector observed several 55-gallon drums properly marked as hazardous waste with hazardous waste codes and accumulation start dates along with the DOT shipping information and UN numbers. See Photograph #1 through #5.

The inspection moved to the West Building S-15. The inspector observed Processing Tank #1 and #2 (each with a capacity of 500 gallons) and Holding Tank#1 and #2 (each with a capacity of 3000 gallons) S-15 of the West Building. The tank system includes a secondary containment

system that is designed to contain a volume of 3000 gallons. The tanks are considered to be a new tank systems since they were installed after March 1, 1991. The tanks were observed with a sign noting a RCRA Permitted Storage Tank and was marked as hazardous waste. No cracks or gaps were observed in the secondary containment system. No waste or liquids were observed within the secondary containment at the time of the inspection. See Photograph #6 through #9.

The inspection continued in the West Building, specifically areas marked as #74-76). In this area, the inspector observed super sacks stored in cubic yard boxes that were slightly tilted, but allowed adequate aisle space. The inspector also observed several boxes and 55-gallon drums that were properly marked as hazardous waste with hazardous waste codes and accumulation start dates along with DOT shipping information and UN number. See Photograph #10 through #12.

At S-3 of the West Building, the inspector observed a Licensed Container Storage Area holding over twenty 55-gallon drums containing hazardous waste. See Photograph #13. The inspector observed each of the drums. Each of the drums were properly marked as hazardous waste with hazardous waste codes and accumulation start dates including DOT shipping information and UN numbers.

The inspection moved to S-2 of the West Building. The inspector observed a Licensed Container Storage Area, S-2, storing over twenty plastic wrapped containers on pallets marked as waste pending analysis and labeled as hazardous waste. See photograph#14-15.

In the License Container Area S-1 of the West Building, the inspector observed over fifty containers and drums storing hazardous waste. Each of the of the containers and drums were observed properly marked with the words hazardous waste, hazardous waste codes and accumulation start dates along with DOT shipping information. See photographs#16 and #17.

Additionally, the inspector observed a Mercury Export Ban Act (MEBA) Storage Area. At the time of the inspection, WMMW received authorization from the Wisconsin Department of Resources (WDNR) to store elemental mercury that is subject to MEBA for more than one year provided WMMW complies with certain conditions. At the time of the inspection, the inspector do not observe any concerns with WMMWI complying with the conditions outlined in the storage authorization, dated November 29, 2012, Subject: Request for Relief on the One Year Storage Limitation for Elemental Mercury. See Photograph #17 through #19.

The inspection continued to an area of the West Building where two roll-off cubic yard box containers with a capacity of approximately forty cubic yards. The inspector observed each of the two roll-off boxes with covered containers. Each of the containers were properly marked with hazardous waste codes and accumulation start dates along with the DOT shipping information and UN number. See Photograph #20. However, the inspector did not observe a sign or placard posted to indicate the licensed storage unit name. At the time of the inspection, a

sign was posted as Licensed Bulk Container Storage, S-8. A photograph of the sign was forwarded to the inspector the following working day.

At S-14 of the Bulk Storage Shed, the inspector observed an empty roll-off box that was covered. See Photograph #22-23.

In the Waste Roll-off Storage Building, Area #65, the inspector observed approximately twenty 55-gallon drums and four containers boxes, and several 30 gallon containers labeled as universal waste. Each of the containers were observed properly marked with accumulation start dates or marked as waste pending analysis. See Photograph #24-27.

The inspection continued to the Licensed Flammable Storage Shed, S-6, located in the Receiving Yard. At the time of the inspection, no hazardous waste was observed in the Shed S-6. See photograph #28.

The inspection moved to the Retorted Tray Storage Area where containers storing retort furnace trays. The trays containing hazardous waste were removed from the stationary retort ovens and were observed marked with the words, waste contents pending analysis. The date the waste was sampled was also provided as required of the hazardous waste treatment and storage license. See photograph #30-33.

Next the inspection continued to S-5 of the East Building. At this location, at least 50 drums and containers of hazardous waste and universal waste were observed at this licensed storage area location. The inspector observed each of the drums. Each of the drums were properly marked as universal waste with accumulation dates or hazardous waste with hazardous waste codes and accumulation start dates along with DOT shipping information. See Photograph #34 -35.

Finally at S-4 of the East Building, the inspector observed at least 50 drums and containers of hazardous waste and universal waste were observed at this licensed storage area location. The inspector observed each of the drums and containers. Each of the drums and containers were properly marked as universal waste with accumulation dates or hazardous waste with hazardous waste codes and accumulation start dates along with DOT shipping information. See Photograph #36-37.

Record Review

At the time of the inspection the generator status was determined to be a licensed treatment and storage facility based on the August18, 2011 Final Determination for WM Mercury Wastes, Inc.

The inspector requested to review the approved feasibility and plan of operation (FPOR), final determination of licensing conditions, waste analysis plan (WAP), hazardous waste

determination documents, hazardous waste manifests, land disposal restriction (LDR) forms, universal waste documents, personnel training documents, weekly inspection logs, record keeping, Subpart BB/CC documentation, preparedness and prevention documentation, contingency plan and personnel training records for the past three years.

The following items were observed as the result of the record review:

Waste Analysis
No concerns were noted in the review of the waste analysis plan.

Waste Generated on-Site and Waste Shipments
No concerns were noted in review of hazardous waste manifest.

Land Disposal Restrictions
No concerns were raised in the review of land disposal restriction documentation.

Preparedness and Prevention
No concerns were noted in the review of preparedness and prevention requirements.

Contingency Plan
In the review of Attachment 19, the Integrated Contingency Plan, the inspector noted that the contingency plan did not accurately reflect what was observed during the inspection tour. The Integrated Contingency Plan, dated 2011, lists licensed container storage areas S-9, S-10, S-11 on page A4-6 as actual storage areas to inspect in the outdoor shed. However, during the February 14, 2014 inspection, the inspector was informed that licensed storage areas S-9, S-10, S-11 were only proposed future storage areas that were planned to be constructed sometime in the future.

Personnel Training
No concerns were noted in meeting training requirements and documentation.

Treatment and Storage Facility Tank System
Tanks system components were installed in 2000. A written assessment was reviewed by an independent certified registered PE to determine whether the tank system has sufficient structural integrity for storing and treating hazardous waste. No concerns were noted in review of tank systems documentation.

Container Standards
Subpart CC
WMMWI assumes the following liquid wastes with organic content greater than 500 ppm:

Retort Liquids	Floor Scrubber Water
Wet Scrubber Water	Wastewater
Dental Liquids	Retort Organics
Wastewater Holding Tank	

No concerns were noted in the review of Subpart CC documentation.

Subpart BB
Based on analytical data WMMWI assumes the following are not subject to Subpart BB due to their total organic content being less than 10% total organics:

Retort Liquids	Floor Scrubber Water
Wet Scrubber Water	Incoming waste streams
Dental Liquids	

Based on analytical data, WMMWI assumes retort organics equipment (decant pump, open ended valves and lines, and connection systems) contains or contacts hazardous waste and are subject to Subpart BB due to their total organic content being greater than 10% total organics. No concerns were noted in the review of Subpart BB documentation.

Universal Waste
No concerns were noted in the review of universal waste documentation.

Financial Responsibility
No concerns were noted in the review of financial responsibility documentation.

Closing Conference
A closing conference was conducted with Joe Carruth and Patrick Baskfield. Mr. Carruth provided some supplemental documentation. Inspector Dabner summarized the areas of concern noted during the inspection. The inspector explained how the observation notes would be reviewed and used to generate an inspection report. Inspector Dabner briefly discussed EPA's procedures for following up with the facility's representative after conducting an inspection.

Post-Inspection
Prior to completion of this inspection report, Joe Carruth provided Inspector Dabner supplemental information. Supplemental information is provided in Attachment E- WM Mercury Waste, Inc. Post-Inspection Document Log.

Attachments

A. WM Mercury Waste, Inc. Inspection Photographs
B. WM Mercury Waste, Inc. Photograph Log
C. WDNR Treatment and Storage Facility Inspection Checklist for WM Mercury Waste, Inc.
D. WDNR Universal Waste Handler Inspection Report-Small Quantity Handler for WM Mercury Waste, Inc.
E. WM Mercury Waste, Inc. Post-Inspection Document Log

ATTACHMENT A

WM Mercury Waste, Inc. Inspection Photographs

WIR 000 000 356

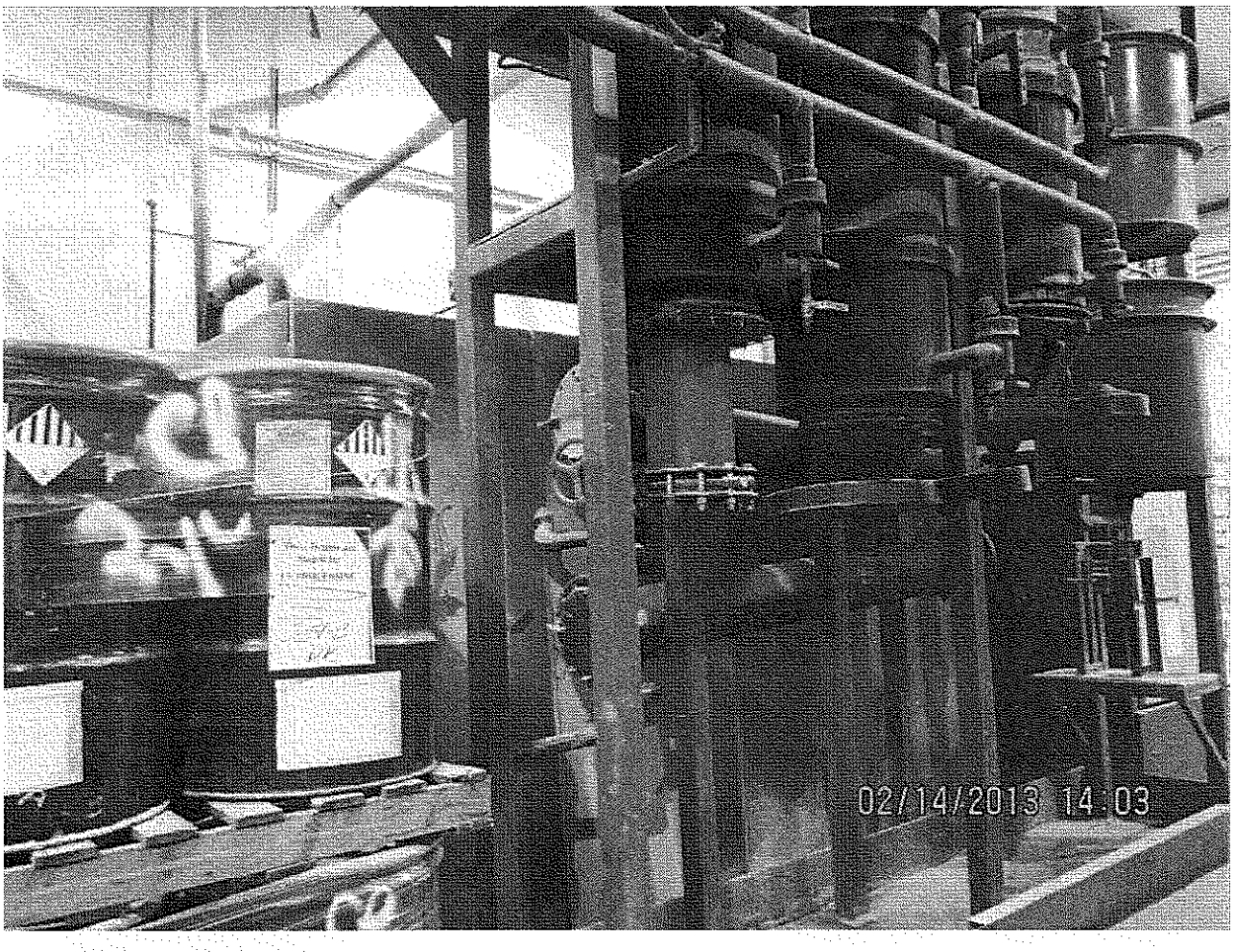
Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #1
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 14, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Entrance to WM-Mercury Waste Inc.

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

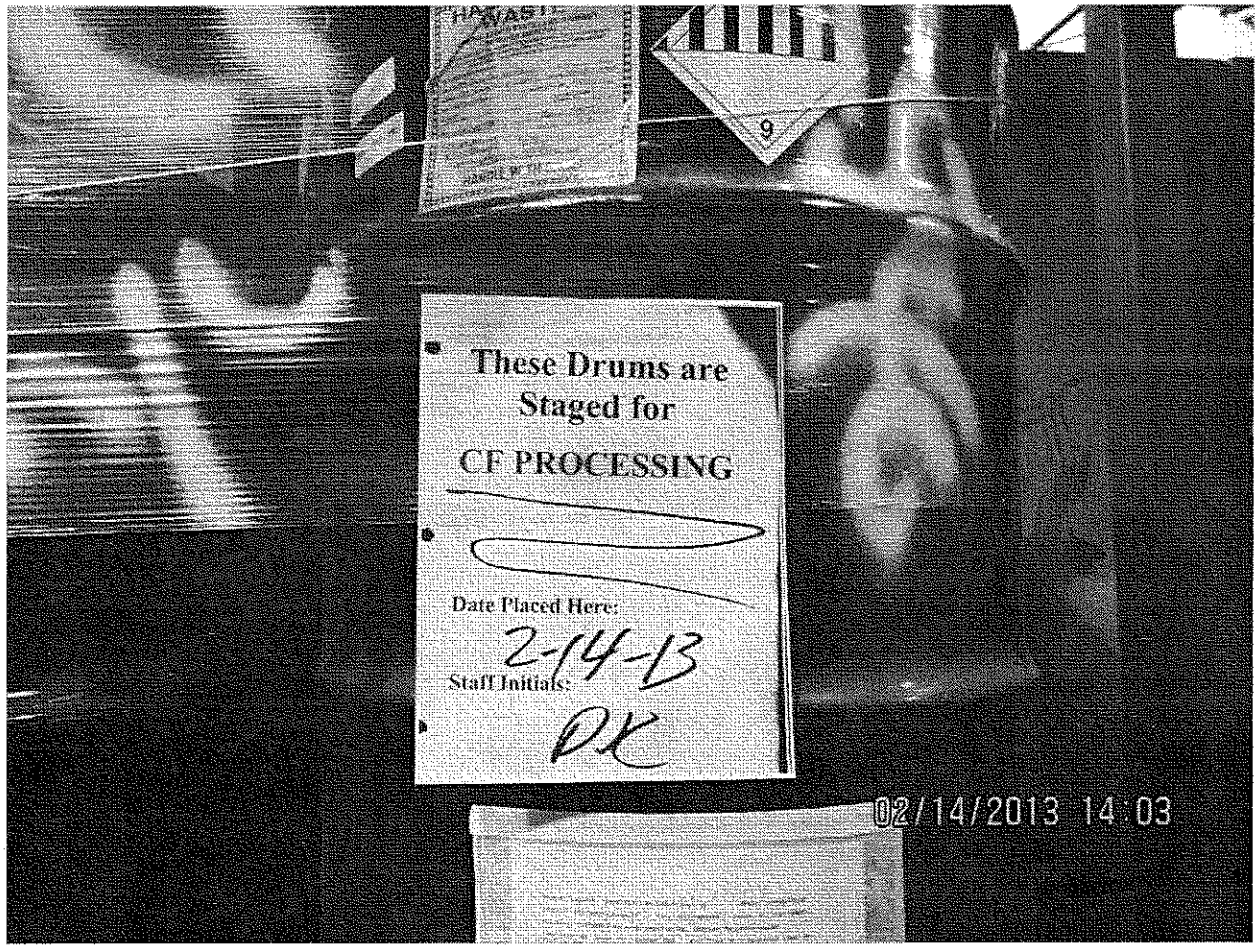
Photograph: # 2
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 14, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Four Drums located in the West Building marked as Hazardous Waste

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



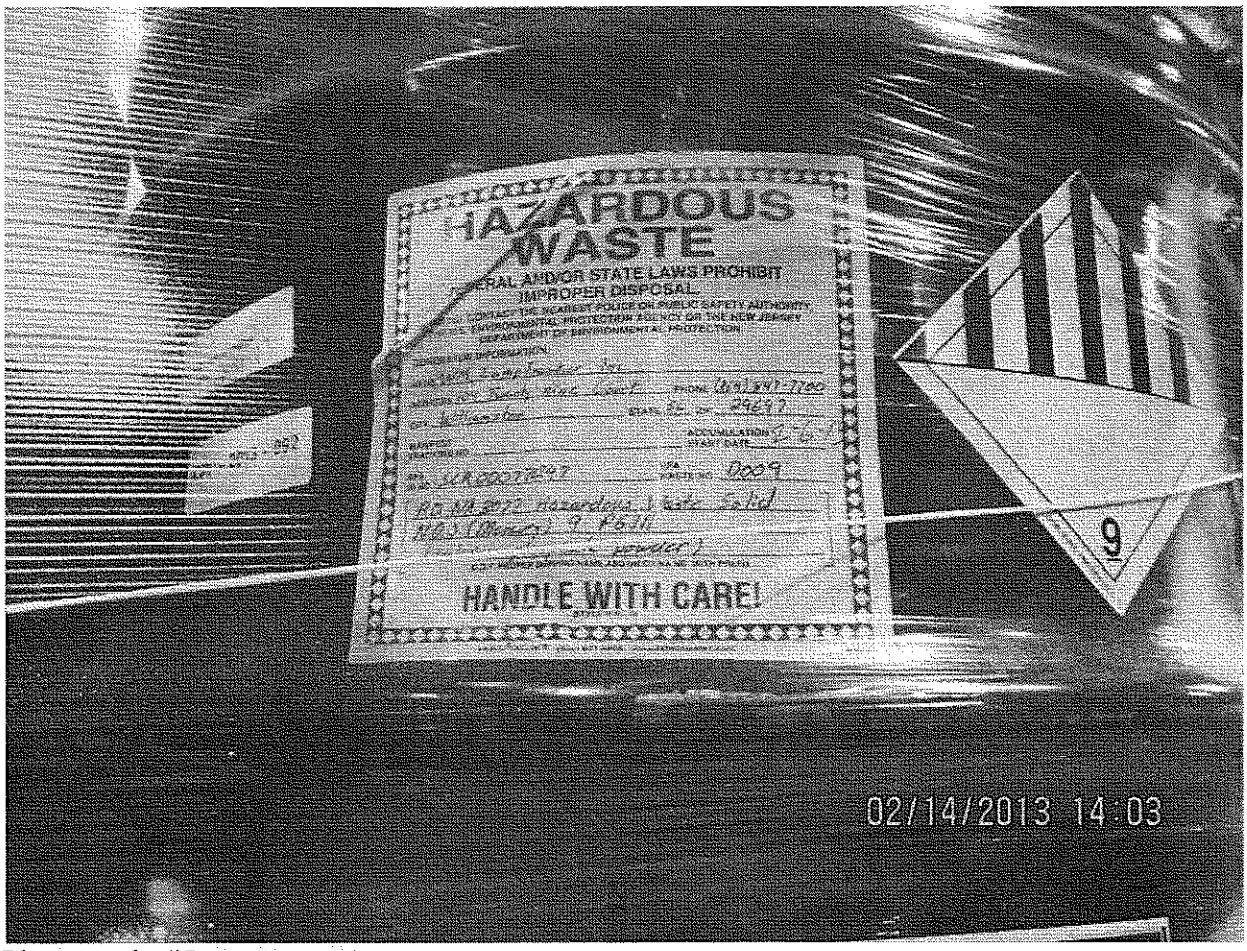
Photograph: #3
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 14, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Closer picture of four drums located in the West Building marked as Hazardous Waste

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



Photograph#4
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 14, 2014
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Closer picture of one drum located in the West Building marked as Hazardous Waste

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

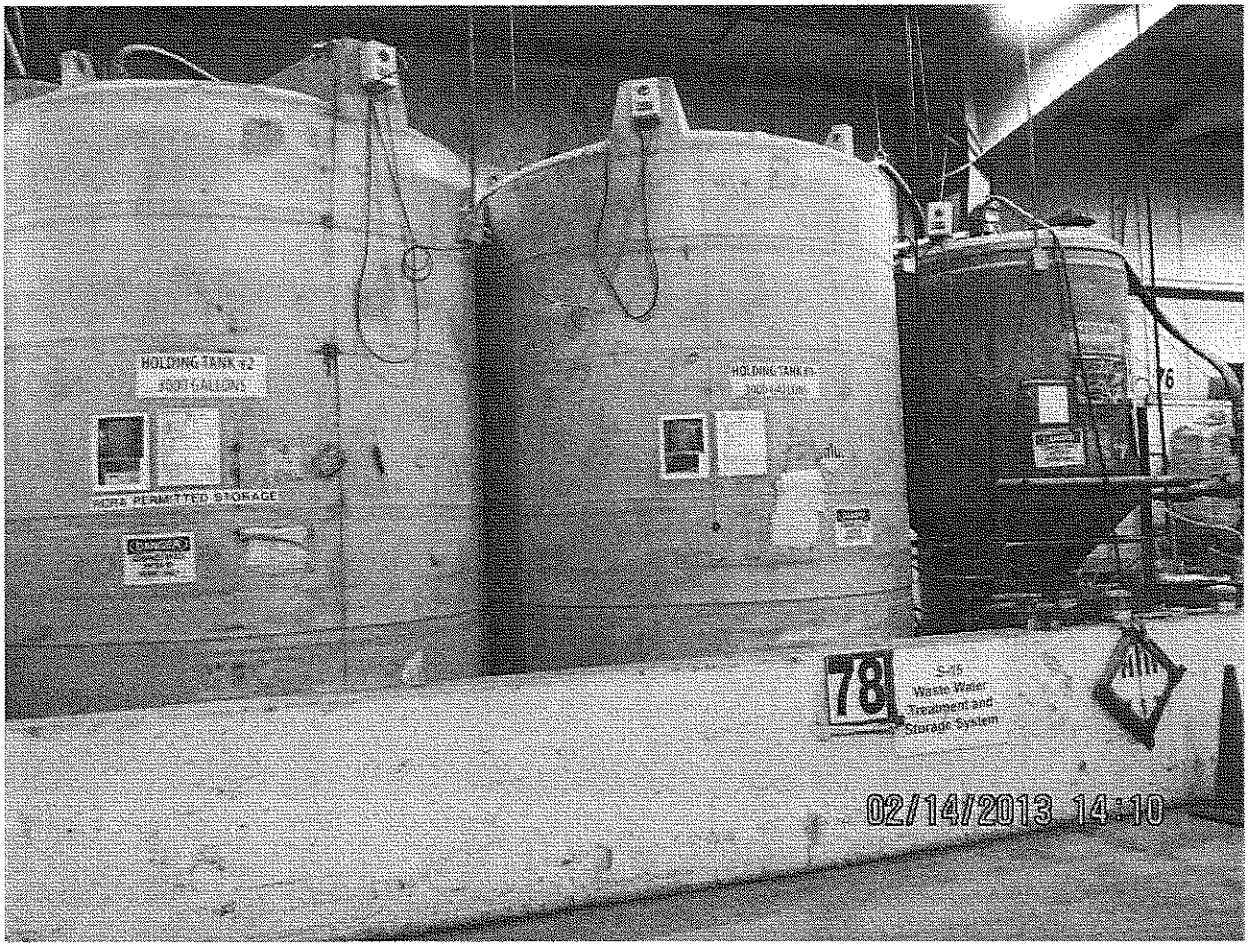


Photograph: #5
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 14, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Closer picture of one drum located in the West Building marked as Hazardous Waste

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

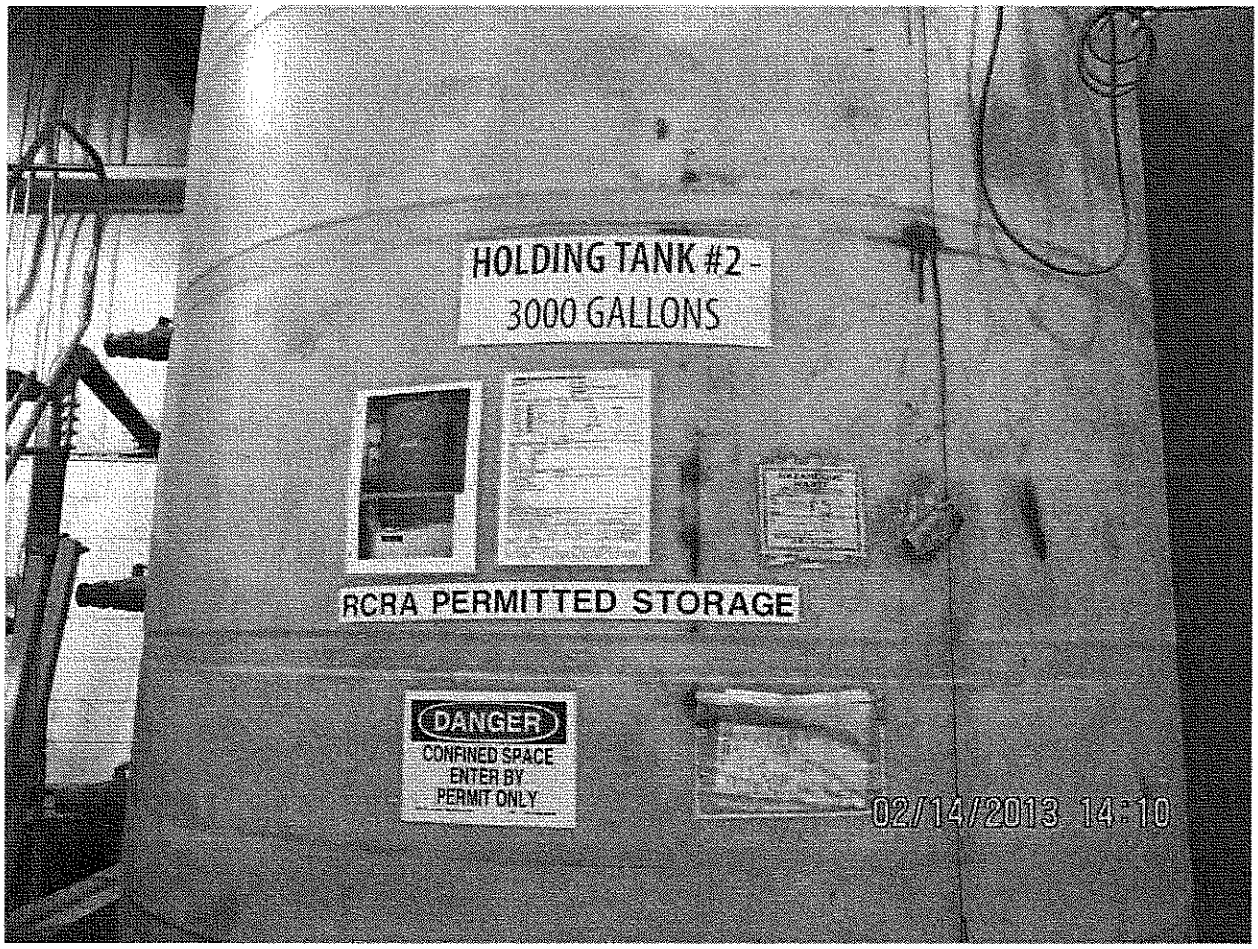
Photograph: #6
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Holding Tanks #and #2 with Processing Tank #1 located in the S-15 of the West Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



Photograph: #7
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Holding Tanks #1 and #2 and Processing Tanks #1 located in the S-15 of the West Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



Photograph: #8
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Holding Tank#2 located in the S-15 of the West Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #9
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Holding Tank #1 and Processing Tanks #1 located in the S-15 of the West Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #10
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Super sacks storing hazardous waste contained in cubic yard containers in the West Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #11
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: 55-gallon drums and super sacks storing hazardous waste contained in cubic yard containers located in the West Building

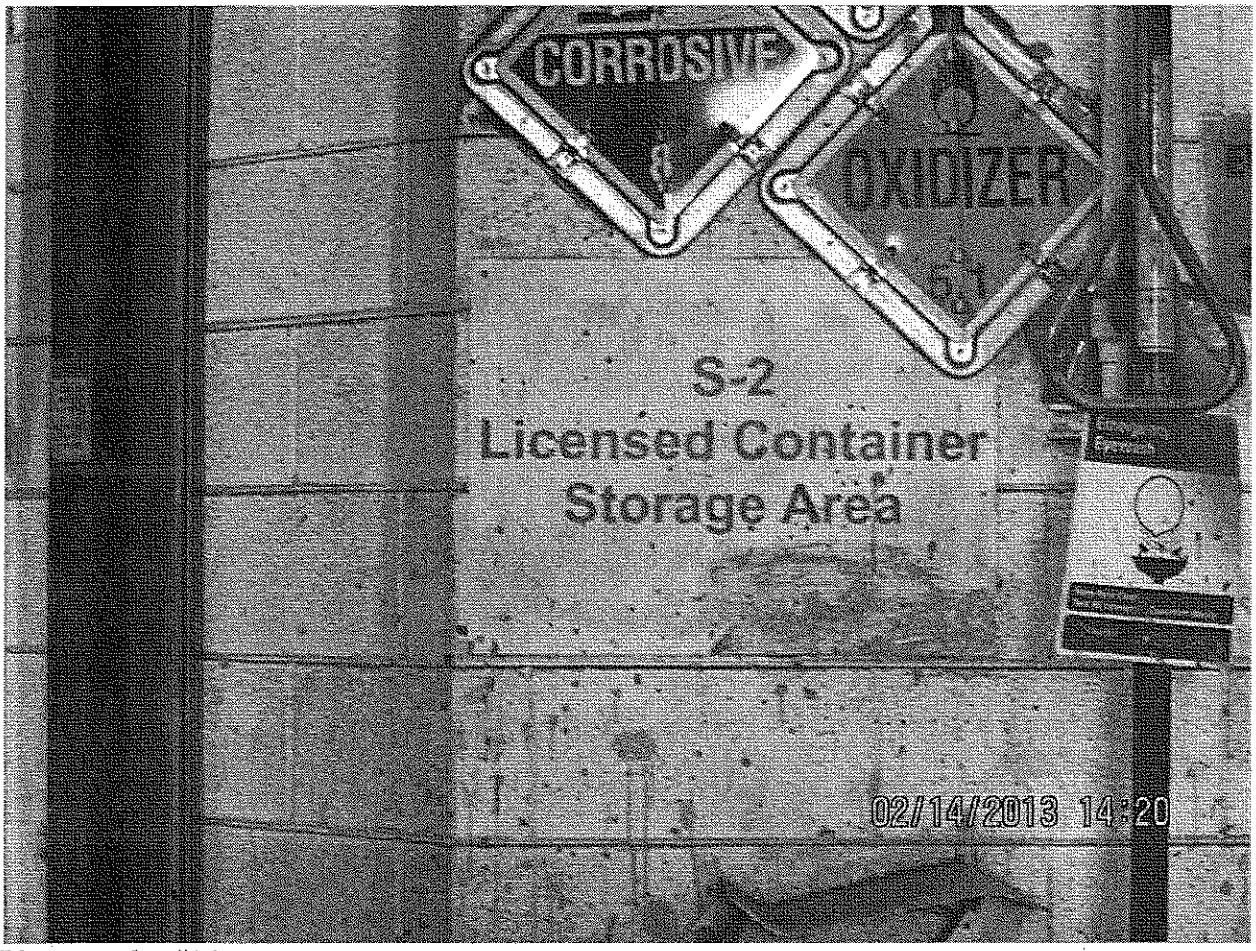
Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #12
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Super sacks storing hazardous waste contained in cubic yard containers in the West Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #13
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: 55-gallon containers located in the S-3 Licensed Container Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



Photograph: #14
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: S-2 Licensed Container Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #15
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Waste Pending Analysis with Hazardous Waste Codes

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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February 14, 2013

Photograph: #16
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: S-1 Licensed Container Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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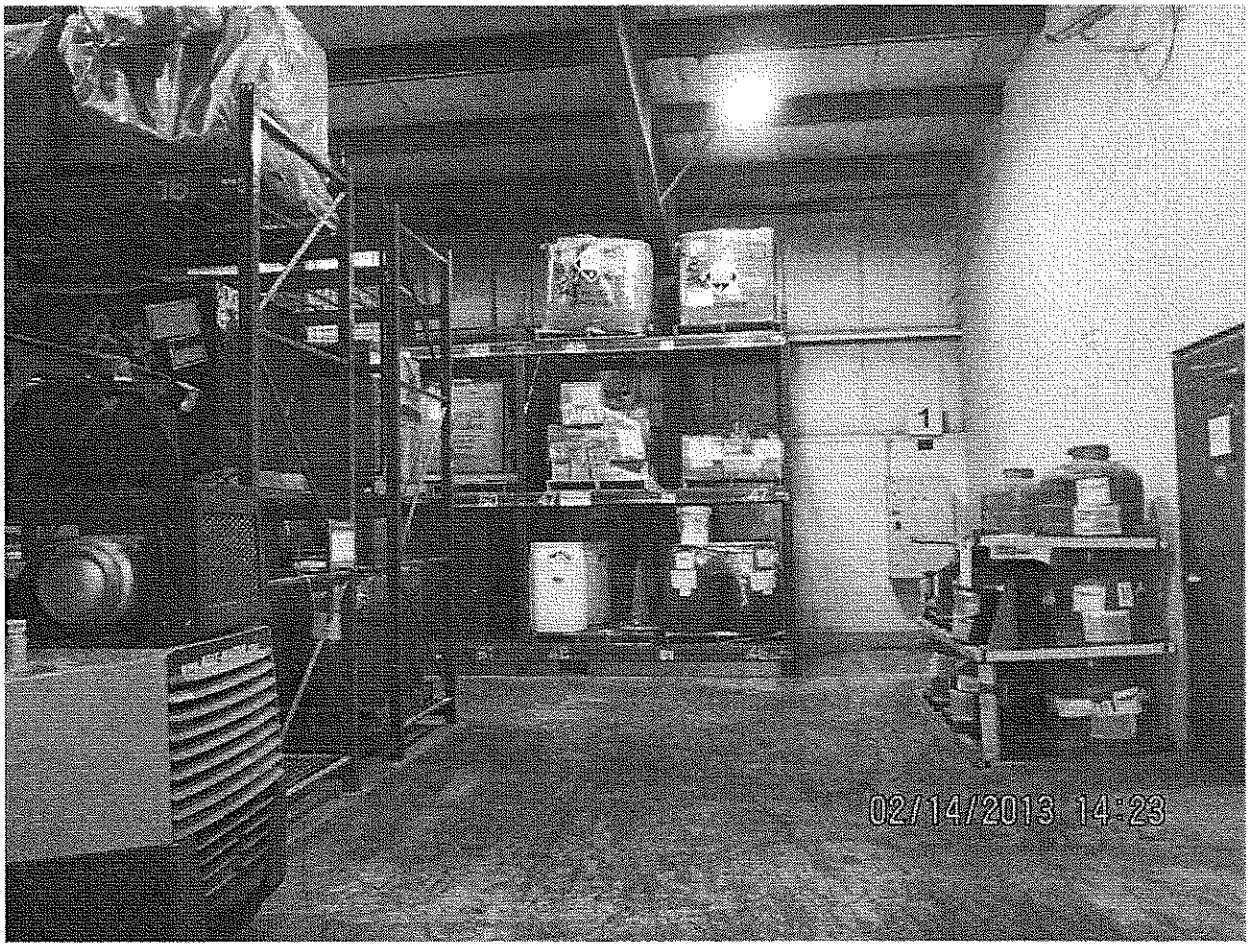
February 14, 2013



Photograph: #17
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: License Container S-1 storing hazardous waste drums and containers along with MEBA Mercury

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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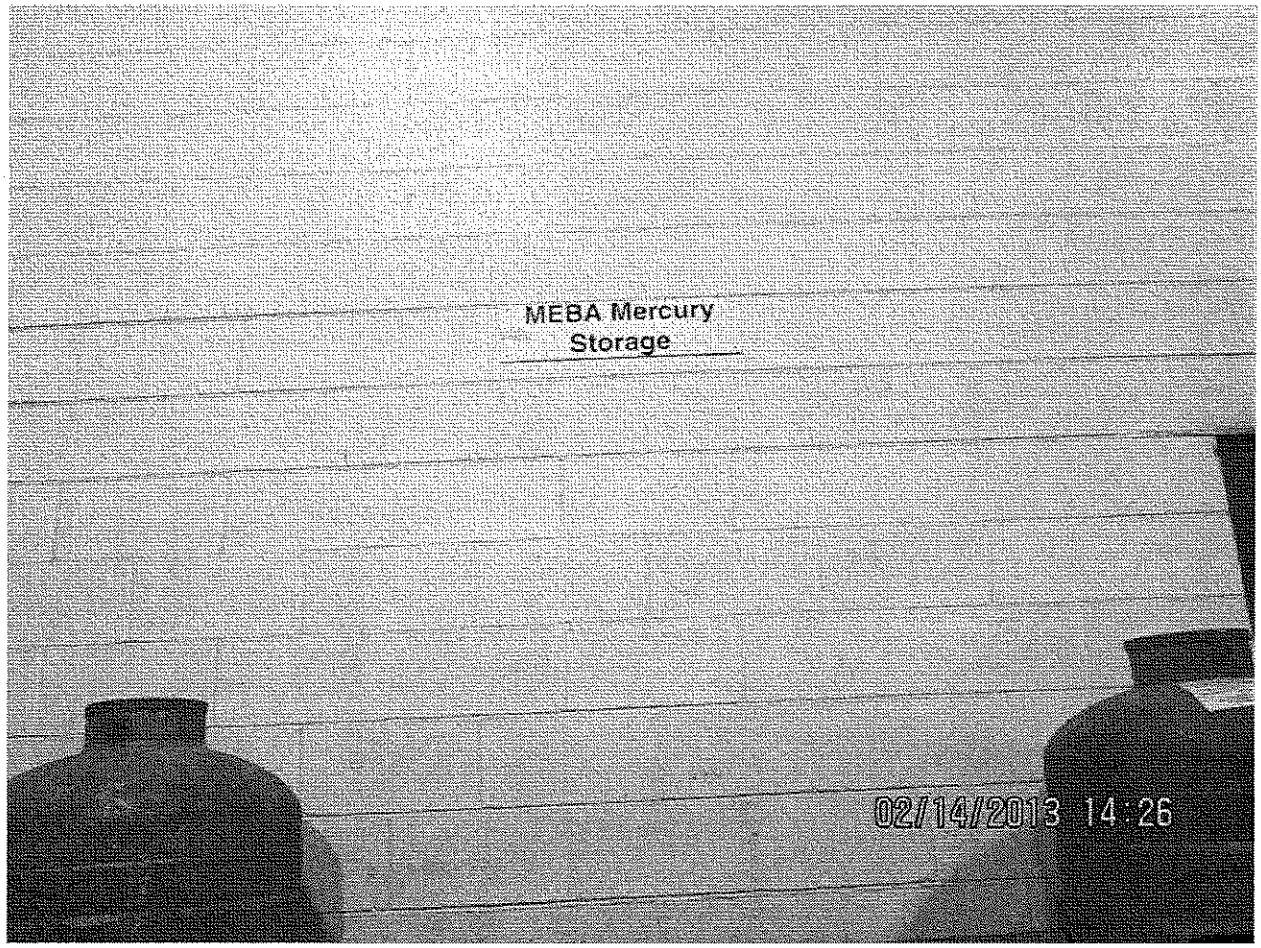
February 14, 2013



Photograph: #18
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: MEBA Mercury Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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Photograph: #19
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: MEBA Mercury Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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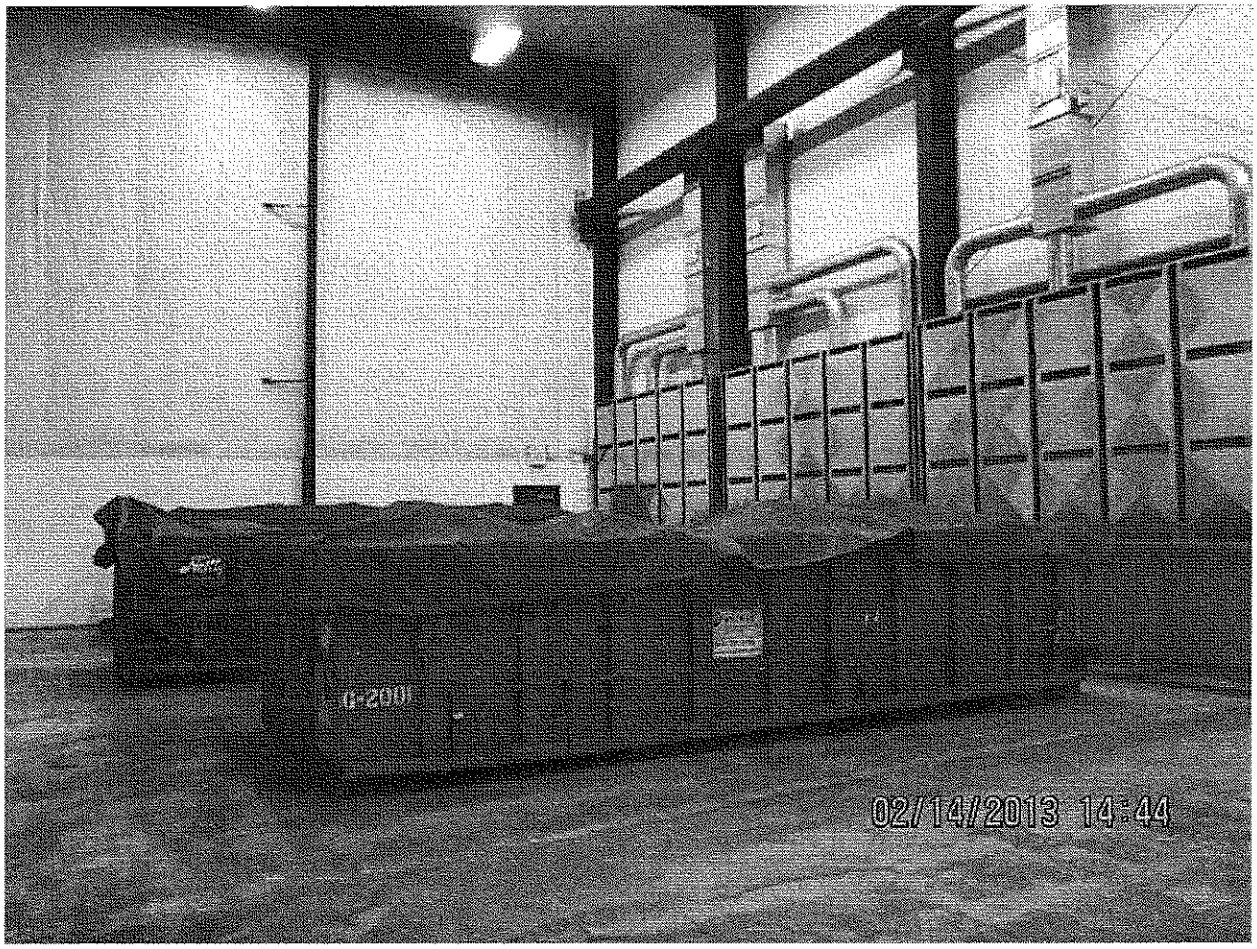

Photograph: #20
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Roll-Off Box Storing Hazardous Waste Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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February 14, 2013

Photograph: #21
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Outside West Building near two roll-off boxes

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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February 14, 2013

Photograph: #22
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Licensed Bulk S-14 Shed with a covered roll-off box

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
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February 14, 2013

Photograph: #23
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Closer picture of Licensed Bulk Shed S-14 with a covered roll-off box

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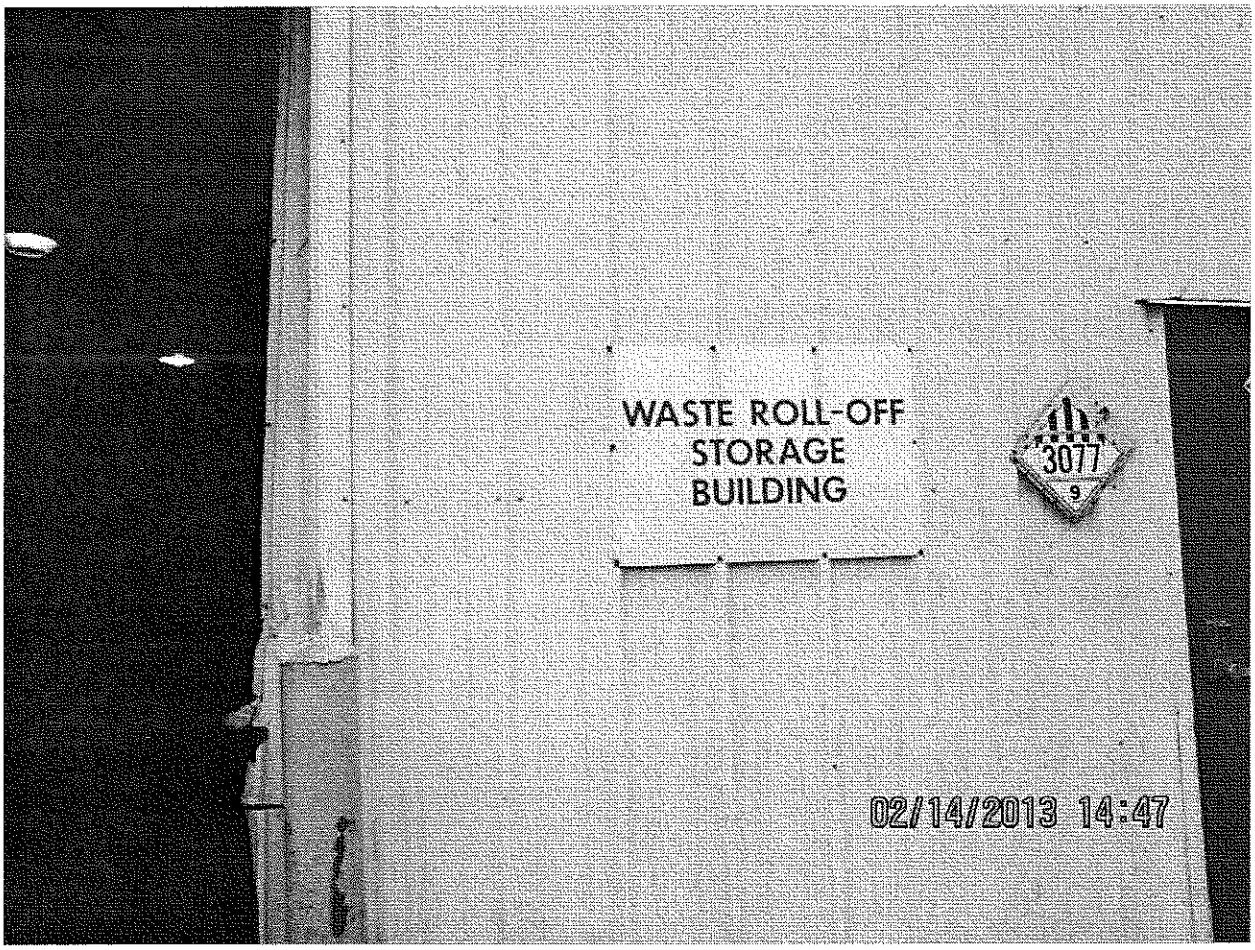
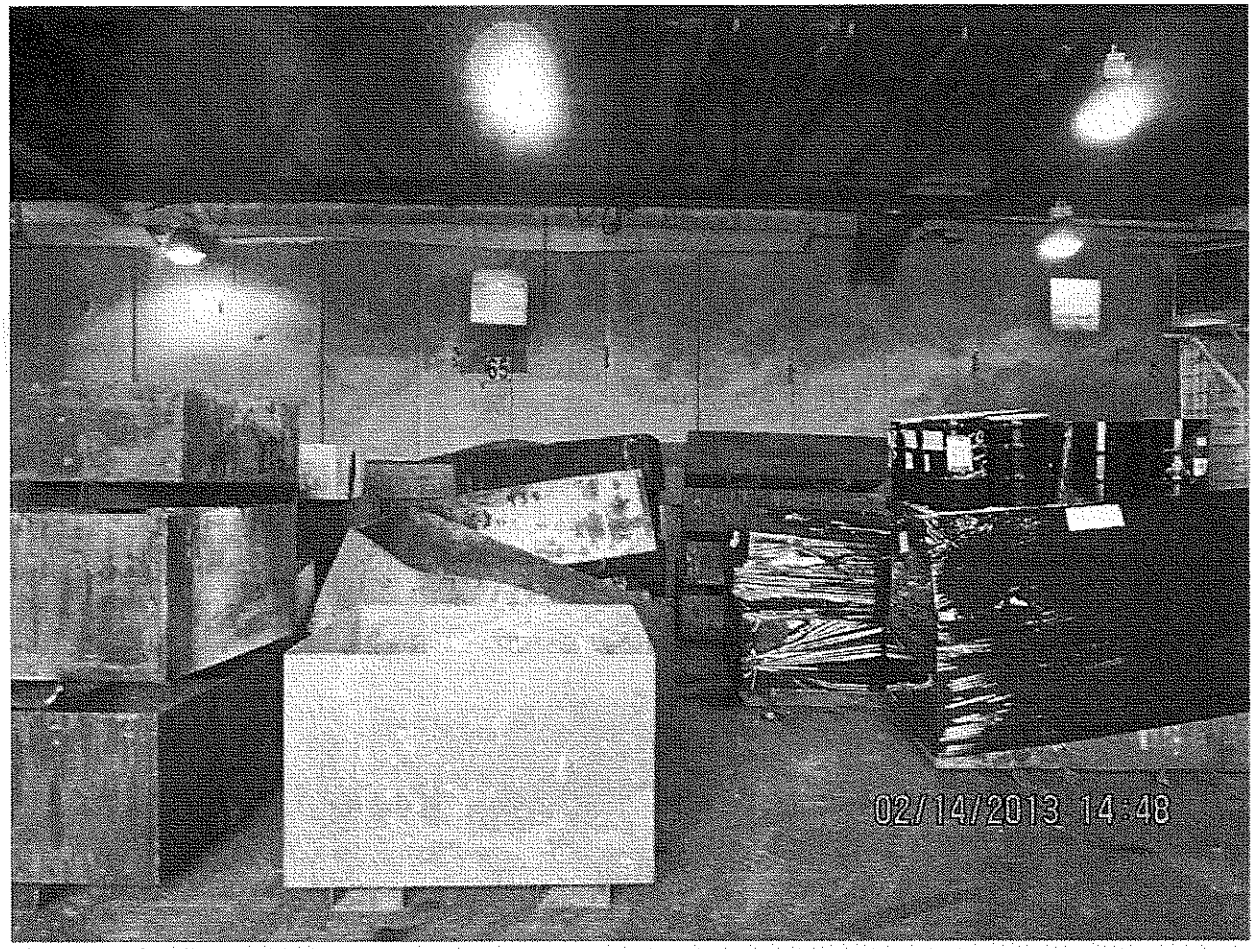
February 14, 2013



Photograph: #24
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Waste Roll-off Storage Building Sign

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



Photograph: #25
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Waste Pending Analysis with Hazardous Waste Codes and 55-Gallon Drums storing Hazardous Waste

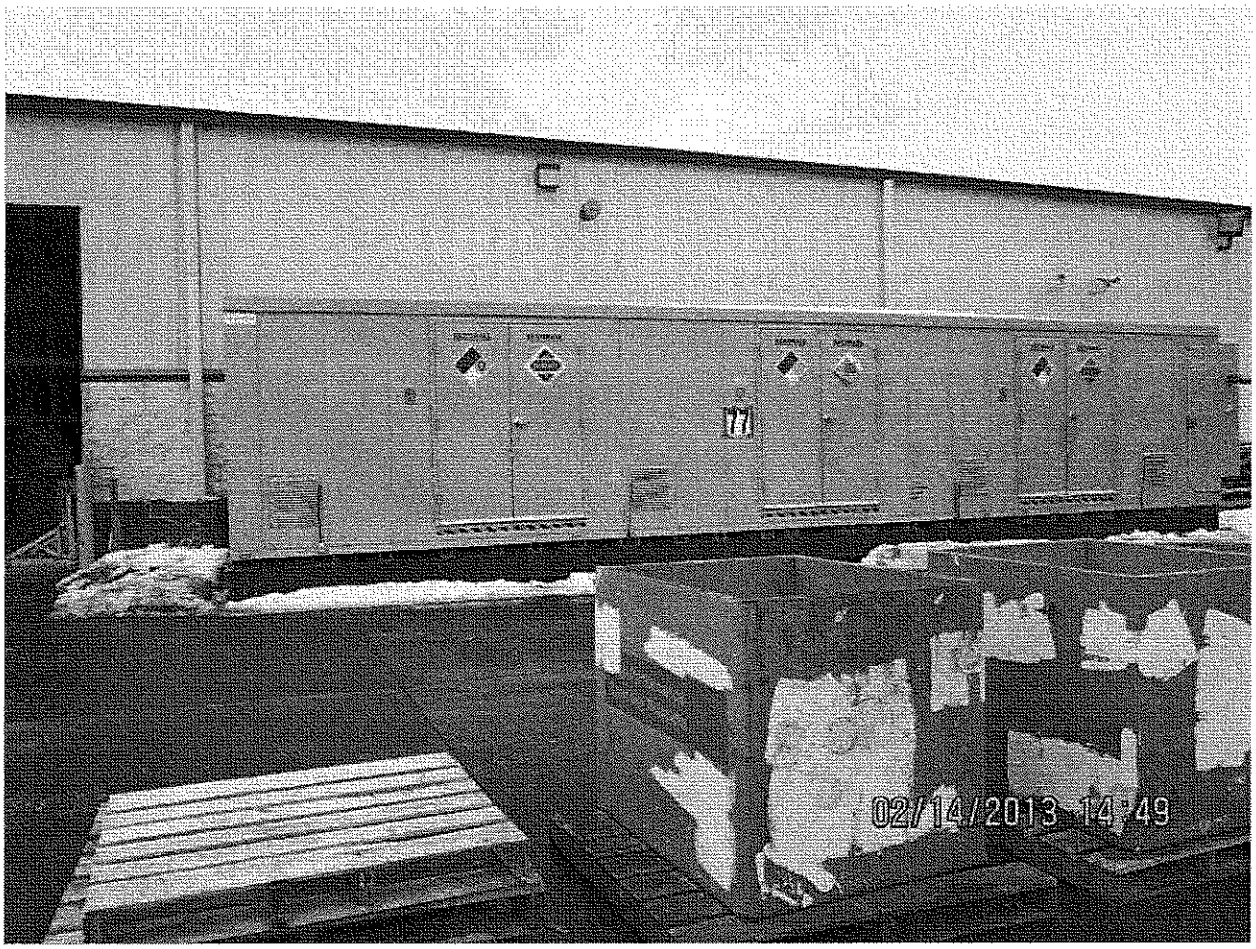
Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #26
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Universal waste stored in a container located in the waste Roll-off Storage Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #27
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Universal Waste located in the Waste Roll-Off Storage Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

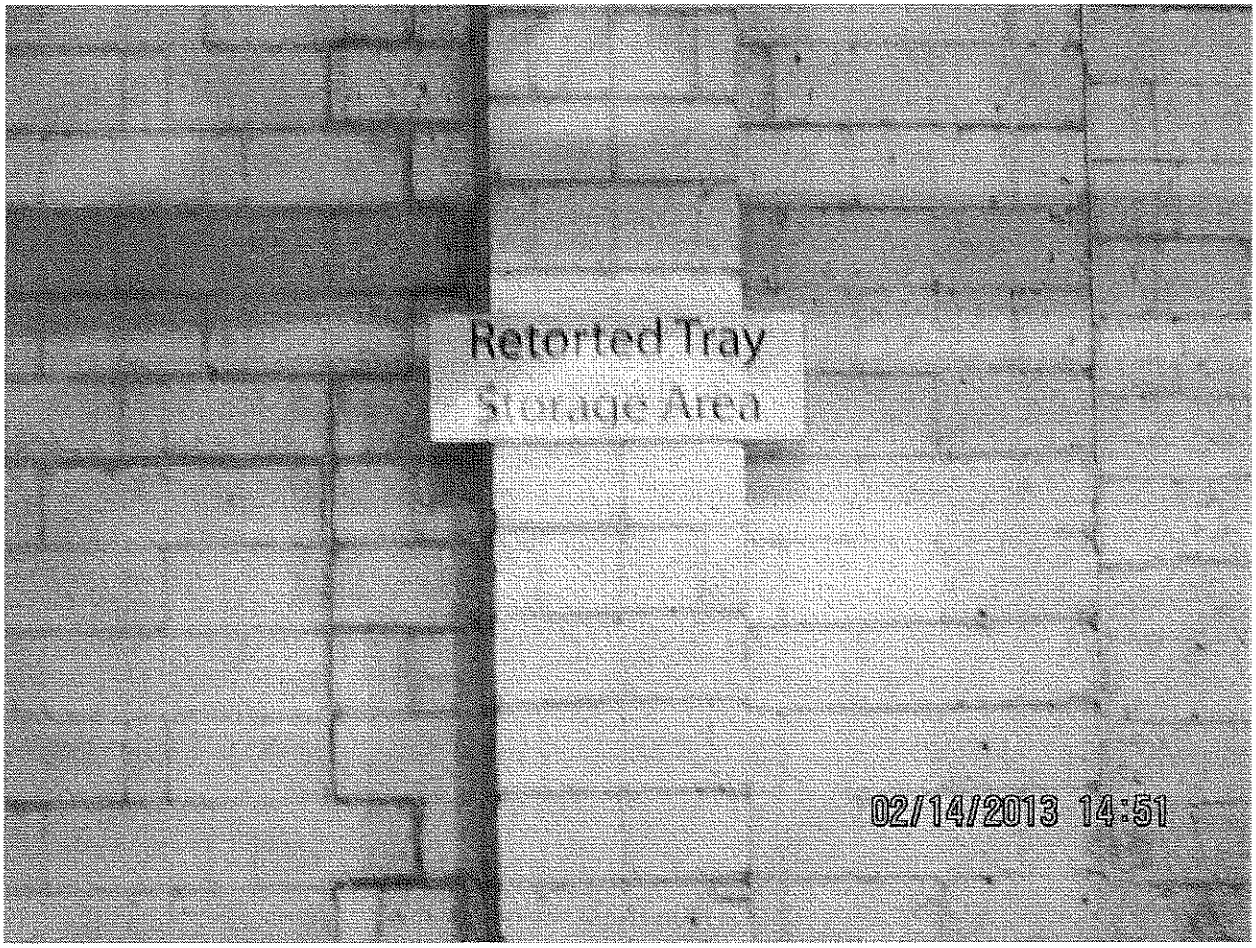


Photograph: #28
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: S-6 Licensed Flammable Storage Shed Located in the Receiving Yard.

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

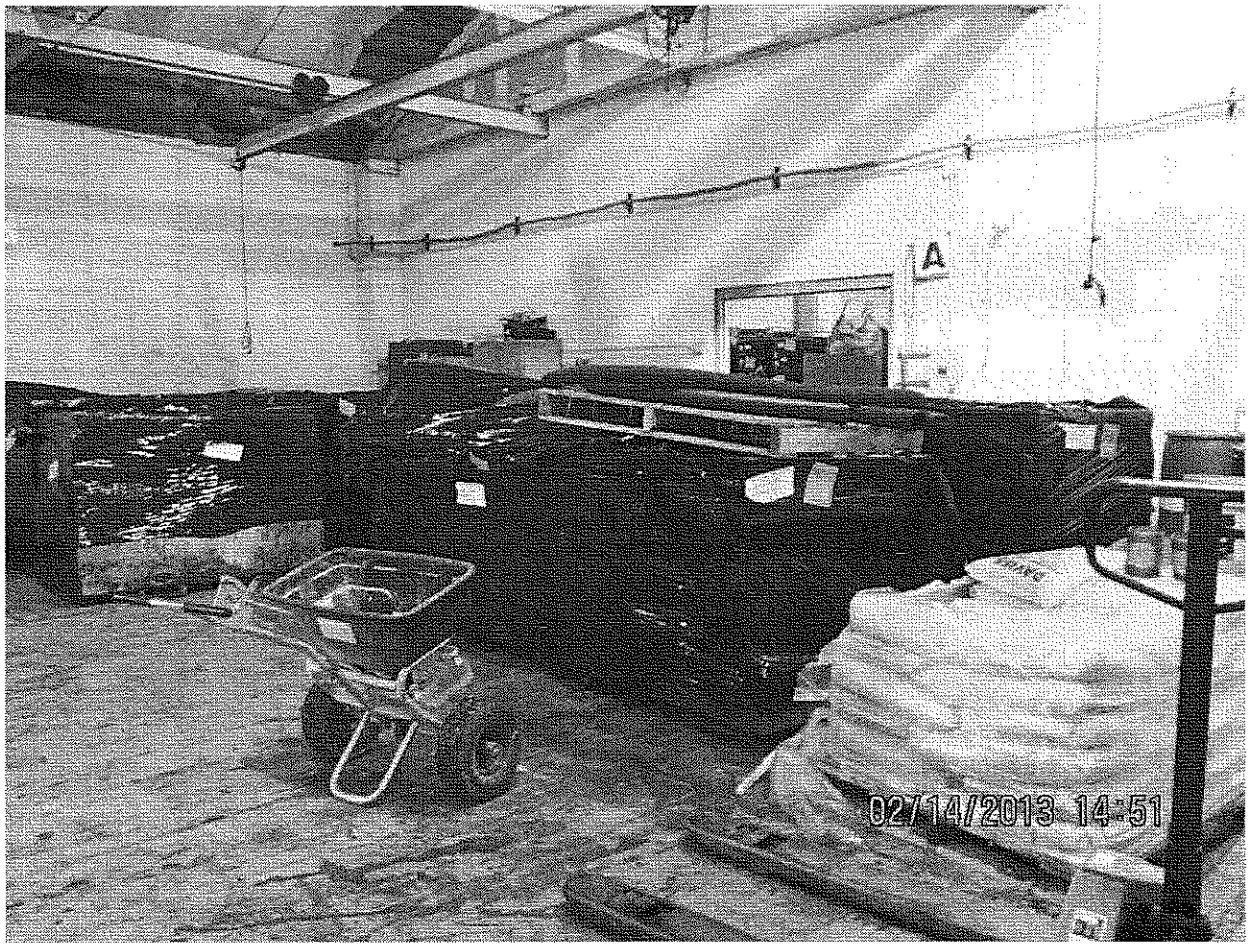
Photograph: #29
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: S-6 Licensed Container Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



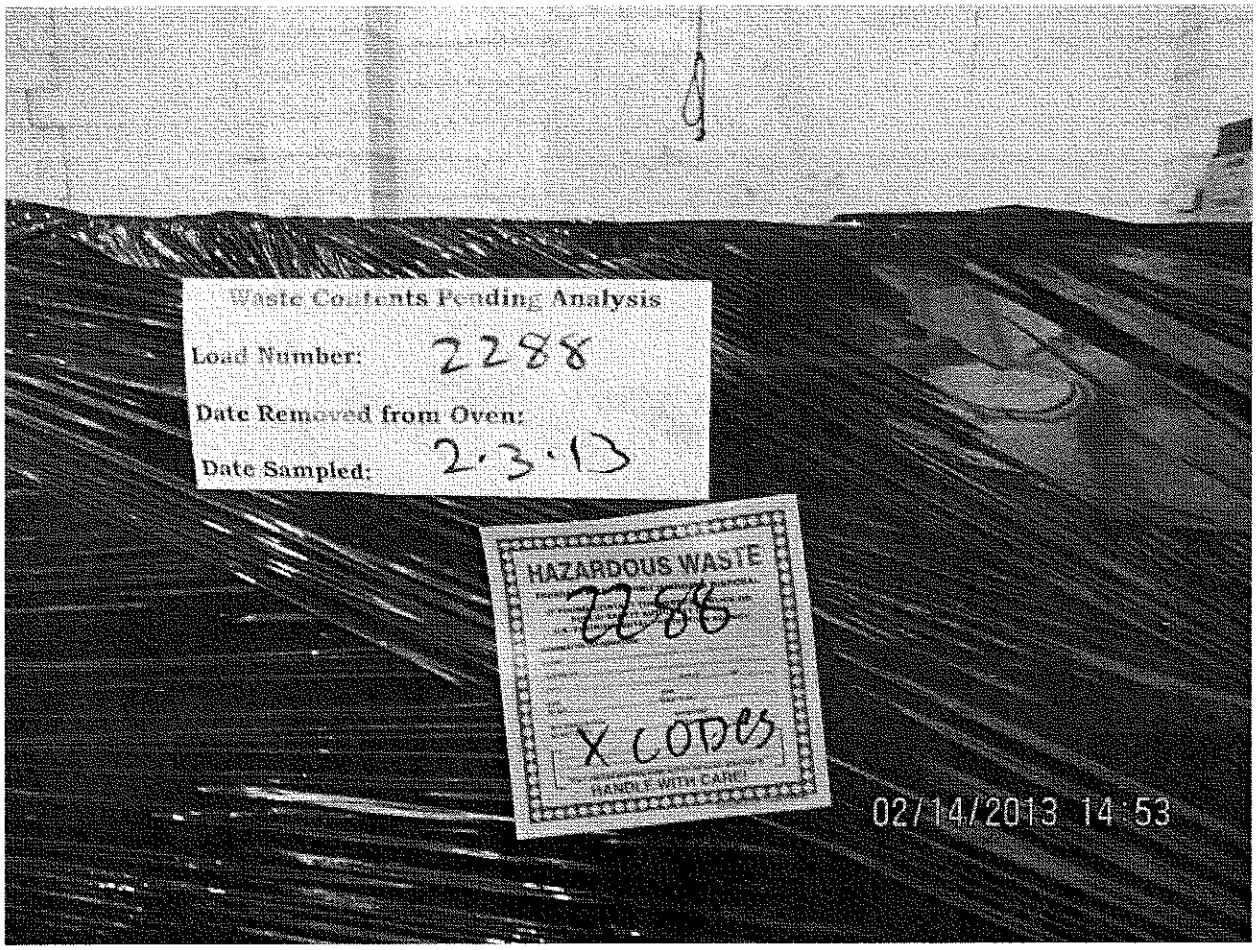
Photograph: #30
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Retorted Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



Photograph: #31
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Waste Pending Analysis located in the Retorted Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013



Photograph: #32
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI
Description: Waste Pending Analysis located in the Retorted Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #33
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Waste Pending Analysis located in the Retorted Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #34
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 2188 Church Street, East Troy, WI 53120
Description: S-5 Licensed Container Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #35
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Hazardous Waste Located in S-5 of the East Building

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #36
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: S-4 Licensed Container Storage Area

Attachment A
Photographs for WM Mercury Waste, Inc. RCRA CEI
WID 006 097 281
February 14, 2013

Photograph: #37
Name of Photographer: Cindy Dabner
Date/Time of Photograph: February 13, 2013
Site Location: 21211 Durand Avenue, Union Grove, WI 53182
Description: Hazardous Waste Drums Located in S-4 of the East Building

ATTACHMENT B

WM Waste Mercury, Inc. Photograph Log

WIR 000 000 356

Attachment B- WM Mercury Waste, Inc. WIR 000 000 356 Photograph Log

Photographer: US EPA Inspector Cindy Dabner

Location: 21211 Durand Avenue, Union Grove, WI 53182

Date(s): February 14, 2013

Photo #	Description	Date
1	Photograph of the facility sign	February 14, 2013
2	Four Drums Located in the West Building	
3	Closer Picture of the Four Drums Located in the West Building	
4	Closer Picture of one drum located in the West Building	
5	Closer Picture of one drum located in the West Building	
6	Holding Tanks#1& #2 and Processing Tank#1 located in S-15	
7	Holding Tanks#1& #2 and Processing Tank#1 located in S-15	
8	Holding Tank#2 located in the S-15 of the West Building	
9	Holding Tank#1 and Processing Tank#1 located in the S-15 of the West Building	
10	Super Sacks storing hazardous waste contained in the cubic yard containers	
11	55-gallon drums and super sacks storing hazardous waste	
12	Super Sacks storing hazardous waste contained in cubic yard containers	
13	55-gallon containers located in the S-3 Licensed Container Storage Area	
14	License S-2 Licensed Container Storage Area	
15	Waste pending analysis with hazardous waste codes	
16	S-1 Licensed Container Storage Area	
17	License Container S-1 storing hazardous waste drums and containers	
18	MEBA Mercury Storage Area	
19	MEBA Mercury Storage Area	
20	Roll-Off Box Storing Hazardous Waste	
21	Outside West Building	
22	Licensed S-14 Bulk Shed with a covered roll-off box	
23	A closer picture of Licensed S-14 Bulk Shed with a covered roll-off box	
24	Waste Roll-Off Storage Building Sign	
25	Waste pending Analysis with Hazardous Waste Codes and 55-Gallon Drums	
26	Universal Waste located in the Waste Roll-Off Storage Building	
27	Universal Waste located in the Waste Roll-Off Storage Building	
28	S-6 Licensed Flammable Storage Shed Located in the Receiving Yard	
29	S-6 Licensed Container Storage	
30	Retorted Storage Area	
31	Waste Pending Analysis Located in the Retorted Storage Area	
32	Waste Pending Analysis Located in the Retorted Storage Area	
33	Waste Pending Analysis Located in the Retorted Storage Area	
34	S-5 Licensed Container Storage Area	

Photo #	Description	Date
35	Hazardous Waste Located S-5 of the East Building	
36	S-4 Licensed Container Storage Area	
37	Hazardous Waste Drums Located in S-4 of the East Building	

ATTACHMENT C

WDNR Treatment and Storage Facility Inspection Checklist

WM Mercury Waste, Inc. WIR 000 000 356

TREATMENT & STORAGE FACILITY INSPECTION

Revision: 03/19/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities having a hazardous waste license to store and/or treat hazardous waste, evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapter NR 660 - 679, Wis. Admin. Code).

Section 1: Waste Received from Off-Site

A. Each manifest is signed and dated to certify receipt.	Y	664.0071(1)(a) Photo☐
B. Significant manifest discrepancies are noted, if applicable.	NA	664.0071(1)(b)2 Photo☐
C. A copy of the signed manifest is provided to the transporter.	Y	664.0071(1)(b)3 Photo☐
D. A copy of the signed manifest is sent to the generator within 30 days.	Y	664.0071(1)(b)4 Photo☐
E. A copy of the signed manifest is sent to the Department within 45 days.	Y	664.0071(1)(b)4 Photo☐
F. A copy of the signed manifest is retained on-site for at least three years.	Y	664.0071(1)(b)5 Photo☐
G. If a significant manifest discrepancy is noted, the facility attempts to reconcile the discrepancy with the generator or transporter.	NA	664.0072(3) Photo☐
H. If there is no resolution within 15 days of receiving the waste, the facility immediately submits a letter to the Department describing the situation and a copy of the manifest.	NA	664.0072(3) Photo☐

Section 2: Rejected Shipments of Waste or Excess Residue in Containers

A. Facility has rejected shipments of hazardous waste or received containers with residues exceeding quantity limits for empty containers. If No, go to Section 3.	NF	Photo☐
B. Facility consulted with the generator before forwarding the waste to another facility.	NC	664.0072(4)(a) Photo☐
C. Facility returns the rejected waste or residue to the generator when they can not forward the waste to an alternate facility.	NC	664.0072(4)(a) Photo☐
D. Facility sends the waste to an alternate facility or the generator within 60 days of rejection or identifying the excess container residue.	NC	664.0072(4)(a) Photo☐
E. Facility ensures the delivering transporter retains custody of the waste.	NC	664.0072(4)(b) Photo☐
F. Facility provides secure, temporary custody of the waste before delivery to the first transporter.	NC	664.0072(4)(b) Photo☐
G. Facility complies with the following if they use the original manifest to reject a full load to an alternate facility before the transporter leaves: 1. The facility forwards the rejected shipment to an alternate facility identified in Item 18b. 2. The facility keeps one copy of the manifest for their records and gives the other copies to the transporter.	NC	664.0072(5)(g) Photo☐

Section 2: Rejected Shipments of Waste or Excess Residue in Containers

H. Facility complies with the following if they use the original manifest to return a rejected shipment to the generator before the transporter leaves: 1. Complete items 18a and 18b, using the generator's information as the alternate facility. 2. Retain one copy of the manifest and give the other copies to the transporter.	NI	664.0072(6)(g) Photo☐
I. Facility complies with the following if they return a rejected waste to the transporter or generator after the manifest has been signed and dated: 1. Amend their copy of the manifest by indicating the rejected waste or residue in the discrepancy space of the manifest. 2. Copy the manifest tracking number from Item 4 of the new manifest to the discrepancy space of the amended manifest. 3. Re-sign and date the manifest to certify the amended information. 4. Retain a copy of the amended manifest for at least 3 years from the date of the amendment. 5. Send a copy of the amended manifest to the transporter, generator, and department within 30 days.	NI	664.0072(7) Photo☐
J. Facility complies with the following for other rejected waste or residues sent to an alternate facility: 1. Prepare a new manifest according to the appendix in 40 CFR part 262. 2. Write the generator's EPA ID #, name and address on the manifest in Items 1 and 5. 3. Write the alternate designated facility and EPA ID # in Item 8. 4. Copy the manifest tracking number in Item 4 of the old manifest to the special handling block in Item 14 and indicate the shipment is a residue or rejected waste. 5. Copy the manifest tracking number in Item 4 of the new manifest to the manifest reference number in Item 18a of the old manifest. 6. Write the DOT description in Item 9, including container types, quantity and volume of waste. 7. Sign the certification in Item 15 as the offerer of the shipment.	NI	664.0072(5) Photo☐
K. Facility complies with the following for other rejected waste or residues sent back to generator: 1. Prepare a new manifest according to the appendix in 40 CFR part 262. 2. Write the facility's EPA ID# in Item 1 and the generator's name and address in Item 5 of the new manifest. 3. Write the name and EPA ID# of the initial generator as the designated facility in Item 8. 4. Copy the manifest tracking number in Item 4 of the old manifest to the special handling block in Item 14 of the new manifest and indicate the shipment as a residue or rejected waste. 5. Copy the manifest tracking number in Item 4 of the new manifest to the manifest reference line in the discrepancy block of the old manifest in Item 18a. 6. Write the DOT description in Item 9, including container types, quantity and volume of waste. 7. Sign the certification in Item 15 as the offerer of the shipment.	NI	664.0072(6) Photo☐

Section 3: Waste Analysis Requirements

A. Before treatment or storage, the facility obtains a detailed chemical and physical analysis of all incoming wastes.	Y	664.0013(1)(a) Photo☐
B. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers.	Y	664.0013(1)(a)1 Photo☐
C. Waste analysis is repeated when EITHER of the following occurs: 1. The process generating the waste has changed. 2. The shipment received does not match the waste designated on the manifest.	X	664.0013(1)(c) Photo☐
D. Facility follows the stated procedures to inspect and, if necessary, analyze each incoming waste shipment to determine if the incoming waste matches the waste specified on the manifest.	Y	664.0013(3) Photo☐

Section 3: Waste Analysis Requirements

E. Facility follows their written waste analysis plan by performing ALL of the following: 1. Test the waste for the stated parameters. 2. Use the stated test methods for each of the parameters. 3. Use the desiginated sampling methods to obtain representative samples. 4. Review or repeat the initial analysis according to stated frequencies. 5. For off-site facilities, maintain waste analysis records supplied by generators.	Y	664.0013(2) Photo ☐

Section 4: Waste Generated On-Site and Waste Shipments

A. A hazardous waste determination has been made on each solid waste generated.	Y	662.011 Photo ☐
B. Waste samples are analyzed by laboratories certified or registered under NR 149. Provide lab names and certification numbers. Env. Monitoring Technologies	Y	662.011(3)(a) Photo ☐
C. Waste determinations are made correctly, considering the listed waste definitions and the characteristics of the waste, in light of the materials or processes used.	Y	662.011(3) Photo ☐
D. Records of all waste determinations are kept on-site for at least 3 years from the date the waste was last sent to a storage, treatment or disposal facility.	Y	662.040(3) Photo ☐
E. A manifest is initiated with all off-site shipments of hazardous waste.	Y	662.020(1) Photo ☐
F. The manifest is used according to the instructions in the appendix to 40 CFR part 262.	Y	662.020(1) Photo ☐
G. The facility designated on the manifest is permitted or licensed to accept the waste.	Y	662.020(2) Photo ☐
H. For out-of-state shipments, a copy of the manifest is sent to the department within 30 days of receiving the signed copy from the designated facility.	Y	662.023(3) Photo ☐
I. Manifest continuation form, EPA form 8700-22A, is prepared according to the instructions in the appendix of 40 CFR part 262.	Y	662.020(1) Photo ☐
J. Copy of the manifest signed by the facility is retained until the signed copy from the designated facility is received.	Y	662.040(1) Photo ☐
K. Copy of each manifest is kept for at least three years from the date of shipment.	Y	662.040(1) Photo ☐
L. Transporter or TSD is contacted if the signed manifest is not received in 35 days.	Y	662.042(1) Photo ☐
M. Exception report is submitted to the Department if signed manifest is not received within 45 days.	Y	662.042(2) Photo ☐

Section 4: Waste Generated On-Site and Waste Shipments

N. Hazardous waste is packaged according to applicable DOT requirements before transport.	Y	662.030 Photo☐
O. Hazardous waste is labeled according to applicable DOT requirements before transport.	Y	662.031 Photo☐
P. Hazardous waste is marked according to applicable DOT requirements before transport.	Y	662.032(1) Photo☐
Q. Containers of 119 gallons and less are marked with the "Hazardous Waste-Federal law prohibit improper disposal" label before transport.	Y	662.032(2) Photo☐
R. Placards are offered to the initial transporter.	NI	662.033 Photo☐

Section 5: Land Disposal Restrictions

A. Facility has determined if each waste is prohibited from land disposal by lab analysis or generator knowledge.	Y	668.07(1) Photo☐
B. Facility complies with the prohibition against dilution of wastes.	Y	668.03 Photo☐
C. A one-time written notice is sent to each treatment, storage or disposal facility with the initial waste shipment.	Y	668.07(1) Photo☐
D. A new notification is sent to the TSD and maintained in the generator file when the waste or receiving facility changes.	Y	668.07(1) Photo☐
E. If the waste MEETS treatment standards, the LDR notice certifies the waste may be land disposed without further treatment.	Y	668.07(1) Photo☐
F. If the waste EXCEEDS treatment standards, the LDR notice gives notification of appropriate treatment and application prohibitions.	Y	668.07(1) Photo☐
G. Underlying hazardous constituents have been identified for characteristic wastes.	Y	668.09(1) Photo☐
H. Generator has identified the treatment standards for the listed waste code, in lieu of the treatment standard for the characteristic waste code, when waste is both a listed and characteristic waste OR has identified the treatment standards for all applicable listed and characteristic waste codes.	Y	668.09(2) Photo☐
I. Each container is clearly marked to identify its contents.	Y	668.50(1)(b) Photo☐
J. Each container is marked with the date on which each period of accumulation began.	Y	668.50(1)(b) Photo☐

Section 5: Land Disposal Restrictions

J. Waste is stored for 1 year or less.	NI	668.50(2) Photo ☐
K. If waste is stored for more than 1 year, the facility can prove that storage is necessary to facilitate proper recovery, treatment or disposal.	NI	668.50(3) Photo ☐

Section 6: Recordkeeping and Reporting

A. An operating record is maintained at the facility.	Y	664.0073(1) Photo ☐
B. The operating record contains ALL of the following information, as applicable: 1. Description and quantity of each waste received. 2. Method and date of each wastes treatment, storage or disposal. 3. Location and quantity of each hazardous waste within the facility. 4. Records and results of the waste analysis performed. 5. Summary reports and details of all incidents that required implementation of the contingency plan. 6. Closure cost estimates and any changes that are made in these estimates. 7. Other monitoring, analytical data and testing, as required. 8. For off-site storage and treatment facilities, a copy of the LDR notice required by the generator or the owner/operator. 9. For on-site storage and treatment facilities, the information contained in the LDR notice, except the manifest number, required by the generator or owner/operator.	Y	664.0073(2) Photo ☐
C. Documents in the operating record are maintained until closure of the facility.	Y	664.0073(2) Photo ☐
D. Annual reports covering facility activities during the previous calendar year are submitted to the Department by March 1 of the following year.	Y	664.0075 Photo ☐
E. Facility submitted an unmanifested waste report within 15 days if the facility received a waste from an off-site source without an accompanying manifest or shipping paper AND the waste is not excluded from manifest requirements due to VSQG status.	NI	664.0076 Photo ☐
F. Annual reports and unmanifested waste reports are available for inspection.	Y	664.0074(1) Photo ☐

Section 7: Preparedness and Prevention

A. Facility is equipped with ALL of the following, unless the equipment is not necessary for the types of wastes handled: 1. Device to summon emergency assistance (e.g., telephone, 2 way radio). 2. Internal communications and alarm systems. 3. Portable fire extinguishers. 4. Fire control equipment, including special extinguishing equipment. 5. Spill control equipment. 6. Decontamination equipment (e.g., eyewash, shower). 7. Water at adequate volume and pressure to supply water spray systems.	Y	664.0032 Photo ☐

Section 7: Preparedness and Prevention

B. Emergency equipment listed in Question 7.A is tested and maintained to assure its proper operation in an emergency.	Y	664.0033 Photo ☐
C. There is immediate access to internal or external alarms or an emergency communication device in hazardous waste handling areas.	Y	664.0034 Photo ☐
D. Facility has made ALL of the following arrangements with emergency organizations: 1. Primary and support roles have been defined if multiple police and fire departments could respond to an emergency. 2. Police, fire and emergency response teams are familiar with the facility layout, hazards of the waste handled, places where personnel work, entrances and roads in the facility and possible evacuation routes. 3. Agreements are made with emergency response contractors and equipment suppliers. 4. Local hospitals are familiar with the properties of wastes handled and the types of injuries or illnesses that could result from an emergency.	Y	664.0037 Photo ☐
E. Aisle space is provided throughout the facility to allow for the unobstructed movement of personnel and all emergency equipment.	Y	664.0035 Photo ☐

Section 8: Contingency Plan

A. Facility has a written contingency plan that will be implemented immediately in the event of a fire, explosion or hazardous waste discharge.	Y	664.0051 Photo ☐
B. Facility amended a SPCC plan or other emergency plan so it sufficiently incorporates hazardous waste management provisions.	Y	664.0052(2) Photo ☐
C. Copies of the contingency plan and all revisions have been made available to police, fire, hospital and emergency response teams.	Y	664.0053(2) Photo ☐
D. Contingency plan was amended due to ANY of the following: 1. Facility license was revised. 2. Contingency plan failed in an emergency. 3. Changes in site design, construction, O&M, or other circumstances affect emergency response. 4. Emergency coordinators changed. 5. Emergency equipment changed.	Y	664.0054 Photo ☐
E. Contingency plan identifies an emergency coordinator who meets ALL of the following: 1. Available or on call to coordinate emergency response measures. 2. Familiar with all aspects of site activities and the contingency plan. 3. Has authority to commit the resources needed to carry out the contingency plan.	Y	664.0055 Photo ☐

Section 8: Contingency Plan

F. Contingency plan includes ALL of the following: 1. Designation of the primary emergency coordinator, with alternates listed in the order of assuming responsibility. 2. Name, address and phone number, office and home, for each emergency coordinator. 3. Description of the arrangements agreed to by the police, fire, hospitals and emergency response teams to coordinate emergency services. 4. Evacuation plan for personnel including signal(s) to be used in the event of evacuation and alternate routes. 5. Actions facility personnel will take in response to a fire, explosion or hazardous waste discharge. 6. List of emergency equipment at the facility including location, description, and capabilities of each item.	Y	664.0052 Photo ☐
G. Contingency plan requires the emergency coordinator to do ALL of the following in the event of a fire, explosion, or discharge of hazardous waste: 1. Activate internal alarms or communication systems. 2. Notify appropriate authorities, if their help is needed. 3. Identify the character, source, amount, and extent of discharged hazardous materials. 4. Assess hazards to human health and the environment. 5. If the incident threatens human health or the environment outside the facility, notify local authorities that evacuation may be necessary and notify the national response center (800-424-8802) and the division of emergency government (800-943-0003). 6. Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread. 7. Monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment if the facility stops operation. 8. Provide for treating, storing, or disposing of recovered waste, contaminated soil, surface water, or other material. 9. Ensure wastes that are incompatible with the released material are not treated, stored or disposed until cleanup is completed. 10. Ensure that emergency equipment is clean and fit for use prior to resuming operations. 11. Notify the department and appropriate state and local authorities before resuming operations. 12. Submit an incident report to the department within 15 days.	Y	664.0056 Photo ☐

Section 9: Security and General Inspection Requirements

A. Facility has EITHER of the following to prevent the unknowing entry and minimize the unauthorized entry of persons or livestock onto active portions of the site: 1. 24-hour surveillance system (guards, facility personnel, or television). 2. Artificial or natural barriers to control entry (fence around active portions of facility) AND a means to control entry (attendants, locked entrances or controlled roadway access).	NA	664.0014(2) Photo ☐
B. "Danger - Unauthorized Personnel Keep Out" signs are posted at entrances and other locations.	NA	664.0014(3) Photo ☐
C. Facility conducts inspections to determine if problems exist which could cause an environmental or human health hazard.	Y	664.0015(1) Photo ☐
D. Inspections are conducted frequently enough to identify and correct problems before they harm human health or the environment.	Y	664.0015(1) Photo ☐

Section 9: Security and General Inspection Requirements

E. Facility is following a written inspection schedule for the following equipment: 1. Monitoring equipment. 2. Safety and emergency equipment. 3. Security devices. 4. Operating and structural equipment.	Y	664.0015(2)(a) Photo☐
F. Facility looks for problems identified in the inspection schedule during their inspections.	Y	664.0015(2)(c) Photo☐
G. Problems are remedied on a schedule that ensures they do not lead to environmental or human health hazards.	Y	664.0015(3) Photo☐
H. Written inspection log is maintained at the facility for at least 3 years.	Y	664.0015(4) Photo☐
I. Inspection logs include ALL of the following: 1. Date and time of inspection. 2. Name of inspector. 3. Notation of the observations made. 4. Date and nature of repairs or remedial actions.	Y	664.0015(4) Photo☐

Section 10: Personnel Training Requirements

A. Facility has a program of classroom instruction or on-the-job training for personnel in hazardous waste management.	Y	664.0016(1)(a) Photo☐
B. Program is directed by a person trained in hazardous waste management procedures.	Y	664.0016(1)(b) Photo☐
C. Program teaches facility personnel hazardous waste management procedures relevant to the positions in which they are employed.	Y	664.0016(1)(b) Photo☐
D. Training program ensures personnel are able to respond effectively to emergencies by familiarizing them with the following applicable items: 1. Contingency plan implementation. 2. Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment. 3. Key parameters for automatic waste feed cut-off systems. 4. Communications and alarm systems. 5. Response to fires or explosions. 6. Response to groundwater contamination incidents. 7. Shutdown of operations.	Y	664.0016(1)(c) Photo☐
E. New employees are trained within 6 months of their assignment.	NA	664.0016(2) Photo☐
F. Employees work in supervised positions until they complete the training.	NA	664.0016(2) Photo☐
G. Personnel take part in an annual review of the training.	Y	664.0016(3) Photo☐

Section 10: Personnel Training Requirements

H. Facility keeps ALL of the following training documents: 1. Job title and the employee name for each position related to hazardous waste management. 2. Job description of each of the above job titles. 3. Description of the amount and type of introductory and continuing training that will be given to each employee. 4. Records that required training has been given to each employee.	Y	664.0016(4) Photo☐
I. Training records are maintained until closure for current personnel and at least 3 years from the date the employee last worked at the facility.	Y	664.0016(5) Photo☐

Section 11: Ignitable, Reactive or Incompatable Waste

A. Facility treats or stores ignitable, reactive or incompatible waste. If NO, go to Section 12.	NC	 Photo☐
B. Facility takes precautions to prevent accidental ignition or reaction in the following ways: 1. Separate and protect waste from sources of ignition or reaction. 2. Confine smoking and open flame to specially designated locations. 3. Conspicuously place "No Smoking" signs where there is a hazard from ignitable or reactive wastes.		664.0017(1) Photo☐
C. Facility treats, stores, or mixes ignitable, reactive, or incompatible wastes so that the waste does not result in any of the following: 1. Generate extreme heat or pressure, fire, or explosion, or violent reaction. 2. Produce uncontrolled toxic mists, fumes, dust or gases in sufficient quantities to threaten human health. 3. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a fire or explosion risk. 4. Damage the structural integrity of the device or facility containing the waste. 5. Otherwise threaten human health or the environment.		664.0017(2) Photo☐
D. Containers of ignitable or reactive waste are located at least 50 feet from the property line.		664.0176 Photo☐
E. Incompatible wastes are stored in separate containers unless the mixing will not generate extreme heat, fire, explosion, toxic gases or other dangers		664.0177(1) Photo☐
F. Containers that previously held waste are washed before adding incompatible waste.		664.0177(2) Photo☐
G. Containers of incompatible wastes are separated or protected from each other by a physical barrier (dike, berm, wall or other device).		664.0177(3) Photo☐

Section 12: Container Standards

A. Facility stores or treats hazardous waste in containers. If NO, go to Section 13.	Y	 Photo☐
B. If a container is leaking or in poor condition, the contents are transferred to another container in good condition.	Y	664.0171 Photo☐

Section 12: Container Standards

C. Containers are made or lined with materials that are compatible with the waste.	Y	664.0172 Photo ☐
D. Containers are kept closed, except when it is necessary to add or remove waste.	Y	664.0173(1) Photo ☐
E. Containers are opened, handled or stored to prevent ruptures or leaks.	Y	664.0173(2) Photo ☐
F. Container storage areas are inspected weekly for leaks and deterioration.	Y	664.0174 Photo ☐
G. Inspections of the container storage areas are documented in an inspection log.	Y	664.0015(4) Photo ☐
H. Base of the containment system is free of cracks and sufficiently impervious to contain leaks.	Y	664.0175(2)(a) Photo ☐
I. Waste and accumulated precipitation are removed from the sump or collection area in a timely manner to prevent overflow of the collection system.	NI	664.0175(2)(e) Photo ☐

Section 13: Subchapter AA Standards for Process Vents

A. The facility conducts distillation, fractionation, thin-film evaporation, solvent extraction, air stripping operations or steam stripping operations in units managing hazardous waste. If NO, go to Section 14.	NI	 Photo ☐
B. The facility has determined that the process vents are not subject to subch. AA by making an initial determination that the time-weighted, annual average total organic concentration of the waste managed in the above units is <10 ppmw by direct measurement of the organic concentration of the waste calculated as an arithmetic mean from 4 grab samples OR by knowledge of the waste.		664.1034(4) Photo ☐
C. If knowledge of the waste was used, the facility maintains ANY of the following: 1. Documentation showing no organic compounds are used in the process. 2. Documentation showing that another identical process generates waste with < 10 ppmw total organic content. 3. If based on prior analysis, documentation showing there has been no change to the process that would affect total organic concentration. 4. Other similar documentation.		664.1034(4) Photo ☐
D. If the facility determined that the average total organic concentration is <10 ppmw, the determination has been made according to ALL of the following: 1. When the waste was first managed in the waste management unit or when the facility became subject to subch. AA. 2. Annually thereafter for continuously generated waste. 3. When there was a change in the waste managed or a change in the process generating or treating the waste.		664.1034(5) Photo ☐
E. The operating record includes the information used to determine that the time weighted, annual average total organic concentration managed in the waste management unit is <10 ppmw.		664.1035(6) Photo ☐

Section 13: Subchapter AA Standards for Process Vents

F. The facility has determined they are not subject to subch. AA because they have certified that all process vents are equipped with air emission controls operating according to the process vent requirements in the Clean Air Act.	NT	664.1030(5) Photo ☐
G. All process vents are excluded from subch. AA requirements because the average total organic concentration is <10 ppmw or because the vents are equipped with air emission controls. If YES, go to Section 14.		 Photo ☐
H. The total organic emissions from all process vents subject to subch. AA have been reduced to EITHER of the following: 1. Below 3 lb/hr and 3.1 tons/yr. 2. By 95 weight percent using a control device.		664.1032(1) Photo ☐
I. Vent emissions and emission reductions or total organic compound concentrations are achieved by add-on control devices that are based on engineering calculations or performance tests.		664.1032(3) Photo ☐
J. When knowledge of the waste or process is used to determine if the process vent is subject to subch. AA standards, the operating log includes ALL of the following information which is based on engineering calculations or performance tests: 1. Vent emissions. 2. Emission reduction rates. 3. Total organic compound concentrations achieved by add-on control devices.		664.1035(6) Photo ☐
K. The facility uses a closed-vent system and control device to reduce total organic emissions. If YES, complete the inspection form, "TSD Subch. AA & BB Standards for Closed Vent Systems and Control Devices".		 Photo ☐

Section 14: Subchapter BB Standards for Equipment Leaks

A. The facility operates any of the following equipment that contains or contacts hazardous wastes with organic concentrations >=10% by weight. If NO, go to Section 15. 1. Pumps in light liquid service. 2. Compressors. 3. Pressure relief devices in gas or vapor service. 4. Sampling connection systems. 5. Open-ended valves or lines. 6. Valves in gas or vapor service or in light liquid service. 7. Pumps or valves in heavy liquid service 8. Pressure relief devices in light liquid or heavy liquid service. 9. Flanges or other connectors.	Y	 Photo ☐
B. The equipment listed in Question 14.A is excluded from subch. BB requirements because it is in vacuum service and individually listed in the facility operating record by an identification number (NR 664.1064(7)(e)).	NA	664.1050(5) Photo ☐
C. The equipment listed in Question 14.A is excluded from subch. BB requirements because it operates < 300 hours per calendar year AND is identified, either by list or location (area or group), in the facility operating record.	NA	664.1050(6) Photo ☐
D. If the facility determines compliance with subch. BB by documenting compliance with the Clean Air Act requirements, the documentation is readily available as part of the operating record.	NA	664.1064(13) Photo ☐

Section 14: Subchapter BB Standards for Equipment Leaks

E. The following information used to determine the applicability of the exclusions in Questions 14.A - 14.D is recorded in the operating log: 1. Analysis determining the design capacity of the hazardous waste management unit. 2. Statement listing the hazardous waste influent to and effluent from each hazardous waste management unit subject to subch. BB and an analysis determining whether these hazardous wastes are heavy liquids. 3. Up-to-date analysis and the supporting information used to determine whether or not equipment is subject to subch. BB.	Y	664.1064(11) Photo☐
F. When knowledge of the nature of the hazardous waste stream or the process by which it was produced is used to determine the applicability of the exclusions, supporting documentation such as the following is recorded in the operating log: 1. Information that the production process does not use organic compounds. 2. The process is identical to a process at another facility where the total organic content was measured at <10% 3. The process has not changed to affect the total organic concentration of the waste.	NA	664.1064(11) Photo☐
G. The operating log includes new determinations which are performed when changes could result in an increase in the total organic content of the waste in contact with equipment determined not to be subject to subch. BB requirements.	NA	664.1064(11) Photo☐
H. All of the equipment listed in Question 14.A is excluded from additional subch. BB requirements. If NO, complete the TSD subch. BB inspection form.	NA	 Photo☐

Section 15: Subchapter CC Level 1 Standards for Containers

A. The facility manages hazardous waste in containers with EITHER of the following design capacities. If NO, go to Question 15.V (NR 664.1086(2)(a)). 1. Between 26 and 119 gallons. 2. Greater than 119 gallons that are not in light material service.	Y	 Photo☐
B. Containers are exempt from subch. CC because of ALL of the following (NR 664.1083(1), NR 664.1082(3)(a)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the container. 2. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the container. 3. The initial determination is reviewed and updated at least once every 12 months. 4. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to 500 ppmw. 5. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	N	 Photo☐
C. For each waste determination, the date, time, and location of each waste sample collected are maintained in the facility records.	Y	664.1089(6)(a) Photo☐
D. Containers are exempt from subch. CC because of EITHER of the following (NR 664.1082(3)): 1. The organic content of all waste entering the container has been reduced by an organic destruction or removal process described in NR 664.1082(3). 2. The hazardous organic constituents of the waste placed in the container have been treated to meet LDR standards.	N	 Photo☐

Section 15: Subchapter CC Level 1 Standards for Containers

E. Containers are excluded from subch. CC because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 664.1080(4)). Note: Certain records must be maintained. Refer to NR 664.1089(9) for more information.	N	Photo☐
F. Containers are excluded from subch. CC because they are used solely to store or treat EITHER of the following (NR 664.1080(2)): 1. On-site remediation wastes generated through NR 700 or RCRA corrective action activities. 2. Radioactive mixed wastes in accordance with NRC requirements.	N	Photo☐
G. Containers are excluded from subchapter CC because of BOTH of the following (NR 664.1080(2), NR 664.1089(10)): 1. They are equipped with air emission controls operated in accordance with the Clean Air Act requirements. 2. Facility records include a certification of such by the owner or operator and the specific air program compliance requirements for the containers .	N	Photo☐
H. All containers managed at the facility are excluded from subch. CC level 1 requirements. If YES, go to Question 15.V.	N	Photo☐
I. Any of the following controls are used on all Level 1 containers subject to subch. CC: 1. Container meets applicable US DOT packaging requirements. 2. A cover and closure devices form a continuous barrier over the container openings such that when they are secured, there are no visible holes, gaps or other open spaces into the container. 3. An organic-vapor suppressing barrier is placed on or over the hazardous waste in an open-top container so that the hazardous waste is not exposed to the atmosphere. Note: Level 1 standards do not apply to satellite accumulation or RCRA empty containers.	Y	664.1086(3)(a) Photo☐
J. Level 1 containers that do not meet applicable US DOT packaging requirements are equipped with covers and closure devices composed of suitable materials that result in BOTH of the following: 1. Minimize exposure of hazardous waste to the atmosphere. 2. Maintain integrity of the covers and closure devices.	NA	664.1086(3)(b) Photo☐
K. If a Level 1 container is filled to the final level in one continuous operation, the closure device is promptly secured in the closed position when the filling operation is concluded.	NA	664.1086(3)(c) Photo☐
L. If a Level 1 container is batch filled, the closure device is promptly secured in a closed position when the container is filled to the intended final level OR the batch loading is completed and any of the following first occurs: 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.	NA	664.1086(3)(c) Photo☐
M. If Level 1 containers are opened to remove hazardous waste, the closure device is secured in the closed position upon completion of a batch removal AND when either of the following first occurs: 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.	Y	664.1086(3)(c) Photo☐
N. If access to the inside of a Level 1 container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity.	Y	664.1086(3)(c) Photo☐

Section 15: Subchapter CC Level 1 Standards for Containers

O. If a Level 1 container is equipped with a pressure relief device that vents to the atmosphere, ALL of the following conditions are met: 1. The device is designed to operate with no detectable organic emissions (< 500 ppmv) when in the closed position. 2. The device is closed when the internal pressure is within the specified operating range. ____ The device opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.	MA	664.1086(3)(c) Photo☐
P. Safety valves are only opened to avoid an unsafe condition.		664.1086(3)(c) Photo☐
Q. When first taking possession of a Level 1 container that will not be emptied within 24 hours, the facility visually inspects the container, cover and closure device for visible cracks, holes, gaps or other open spaces on or before the date the facility accepts the container (e.g., signs the manifest).		664.1086(3)(d) Photo☐
R. If a Level 1 container remains at the facility for one year or more, the container, its cover and closure devices are visually inspected initially and at least once every 12 months for cracks, gaps or other open spaces.		664.1086(3)(d) Photo☐
S. When a defect is detected, initial repair efforts are made within 24 hours of detection and completed within 5 calendar days.		664.1086(3)(d) Photo☐
T. If repairs cannot be completed in 5 days, the waste is removed from the container which is not used until it is repaired.		664.1086(3)(d) Photo☐
U. Inspections records for subchapter CC containers are maintained in the operating log for at least 3 years.		664.0015(2)(d) Photo☐
V. If a facility managed hazardous waste with an average VO concentration >500 ppmw or without adequate reduction of the organic content by an organic destruction or removal process in a container exempt from subch. CC level 1, 2 or 3 standards, the facility submitted a written report to the department which includes all of the following information: 1. Name of the facility, EPA ID#, and address. 2. A description of the noncompliance event and the cause. 3. The dates of noncompliance. 4. The actions taken to correct the noncompliance and prevent reoccurrence.		664.1090(1) Photo☐
W. The report in Question 15.W is submitted within 15 calendar days of the time the owner or operator becomes aware of the occurrence.		664.1090(1) Photo☐

Section 16: Subchapter CC Level 2 Standards for Containers

A. The facility manages hazardous waste containers with a design capacity >119 gallons that are in light material service. If NO, go to Section 17.	MA	 Photo☐
B. Any of the following controls are used on Level 2 containers: 1. Container meets applicable US DOT packaging requirements. 2. Each potential leak interface where organic vapor leakage could occur on the container, cover and closure device has been checked to determine that no detectable organic emissions (< 500 ppmv) are occurring. 3. The facility has demonstrated within the last 12 months that the containers are vapor-tight using Method 27 in appendix A of 40 CFR part 60.		665.1087(4)(a) Photo☐

Section 16: Subchapter CC Level 2 Standards for Containers

C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51.	NA	665.1087(5)(b)1 Photo ☐
D. If the potential leak interface on the containers were checked, BOTH of the following were met: 1. Checks were made on the interface of the cover rim and the container wall; the periphery of any opening on the container or container cover and its associated closure device; and, the sealing seat interface on a spring-loaded, pressure-relief valve. 2. The test was performed when the container was filled with a material having a VO concentration representative of the hazardous waste expected to be stored in the container.		665.1087(4)(a) Photo ☐
E. The facility maintains a copy of the procedure used to determine that containers >119 gallons in size that do not meet DOT requirements are not managing hazardous waste in light material service.		665.1087(3)(e) Photo ☐
F. Level 2 controls are used when transferring waste in or out of the container that minimize exposure to the atmosphere (submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices.		665.1087(4)(b) Photo ☐
G. If the container is filled to the final level in one continuous operation, the closure devices are promptly secured in the closed position when the filling operation is concluded.		665.1087(4)(c)1.a Photo ☐
H. If the container is batch filled, the closure devices are promptly secured in a closed position upon filling the container to the intended final level, or when the batch loading is completed and ANY of the following first occurs: 1. No additional material will be added within 15 minutes. 2. The person performing the loading operation leaves the immediate vicinity of the container. 3. The process generating the waste shuts down.		665.1087(4)(c)1.b Photo ☐
I. If containers are opened to remove hazardous waste, closure devices are secured in the closed position upon completion of a batch removal and either of the following first occurs: 1. No additional materials will be removed within 15 minutes. 2. The person removing the waste leaves the immediate vicinity of the container.		665.1087(4)(c)2.b Photo ☐
J. If access to the inside of the container is needed to perform routine activities other than the transfer of hazardous waste (e.g., sampling), the closure device is secured in the closed position promptly after completing the activity.		665.1087(4)(c)3 Photo ☐
K. If the container is equipped with a pressure relief device that vents to the atmosphere, the device meets ALL of the following conditions: 1. Designed to operate with no detectable organic emissions when in the closed position. 2. Closed when the internal pressure is within the specified operating range. 3. Opens and vents to the atmosphere only for the purpose of maintaining internal pressure according to the design specifications.		665.1087(4)(c)4 Photo ☐
L. Safety valves are only opened to avoid an unsafe condition.		665.1087(4)(c)5 Photo ☐
M. When a defect is detected, initial repair efforts are made within 24 hours of detection.		665.1087(4)(d)3 Photo ☐
N. Repairs are completed within 5 days, or the waste is removed from the container which is not used until the defect is repaired.		665.1087(4)(d)3 Photo ☐

Section 17: Subchapter CC Level 3 Standards for Containers

A. The facility manages hazardous waste in containers having a design capacity >26 gallons during a waste stabilization process when hazardous waste is exposed to the atmosphere. If NO, go to Section 18.	N	Photo☐
B. The container is vented directly through a closed-vent system to a control device, or the container is vented inside an enclosure which is exhausted through a closed-vent system to a control device.		665.1087(5)(a) Photo☐
C. If the container is vented inside an enclosure, the enclosure is operated according to the criteria for permanent total enclosures found in Method 204 in appendix M of 40 CFR part 51.		665.1087(5)(b)1 Photo☐
D. Records for the most recent set of calculations and measurements verifying the enclosure meets the criteria for a permanent total enclosure in Method 204 in appendix M of 40 CFR part 51 are maintained at the facility.		665.1090(4)(a) Photo☐
E. Level 3 controls are used when wastes are transferred in or out of the container that minimize exposure to the atmosphere (e.g., submerged-fill pipe, vapor-recovery system, etc.) to the extent practical, considering the physical properties of the hazardous waste and good engineering and safety practices.		665.1087(5)(f) Photo☐

Section 18: Financial Responsibility

A. The facility maintains the following proof mechanism for closure: 1. Closure trust fund 5. Net worth test 2. Surety bond 6. Deposit with the department 3. Letter of credit 7. Escrow account 4. Insurance 8. Multiple financial mechanisms	Y	664.0143 Photo☐
B. The facility complies with EITHER of the following: 1. The amount of the proof mechanism being maintained is adequate to cover the most recent closure cost estimate. 2. The facility is taking steps to increase the financial assurance to cover the closure costs within 60 days of a cost increase.	Y	664.0143 Photo☐
C. The facility has the following type of liability coverage for sudden accidental occurrences: 1. Insurance 5. Surety bond 2. Financial test 6. Trust fund 3. Guarantee 7. Multiple financial mechanisms 4. Letter of credit	Y	664.0147(1) Photo☐
D. Indicate the date of the most recent financial review done by the Department.		 Photo☐
E. The Department found that the financial responsibility for closure and liability coverage was adequate during the most recent financial review.	NA	 Photo☐

Section 19: License Requirements

A. Facility is in compliance with the conditions of their license. Conditions # 27 + 28	N	670.032 Photo☐
B. Facility has not exceeded capacity limits for storage or treatment units.	Y	670.032 Photo☐

Section 19: License Requirements

C. Facility notified the Department or requested a modification to their license, as required, for any changes at the facility.	Y	670.042 Photo ☐

Section 20: Waste Minimization

A. Facility has a program to reduce the volume and toxicity of hazardous waste generated to the greatest economical degree possible.	M	664.0073(2)(i) Photo ☐
B. A waste minimization certification is signed at least annually and is maintained in the facility's operating record.		664.0073(2)(i) Photo ☐
C. Facility includes waste minimization information in its annual report.		664.0075 Photo ☐

Section 21: Used Oil

A. Used oil is managed on-site. If NO, go to Section 22	M	 Photo ☐
B. Used oil containing >= 1,000 ppm halogens is managed as listed hazardous waste or the rebuttable presumption requirements have been met.		679.10(2)(a)2 Photo ☐
C. Used oil containers and tanks are in good condition and not leaking.		679.22(2) Photo ☐
D. Used oil containers and tanks are marked "used oil".		679.22(3)(a) Photo ☐
E. Transporter has an EPA ID number, except when generator self-transports or has a tolling agreement.		679.24 Photo ☐
F. Used automotive oil filters and oil absorbent material are not land filled, except if less than 1 gallon absorbent results from a non-routine spill.		 Photo ☐
G. If used oil is burned in an on-site used oil-fired space heater, all of the following are met: 1. Only used oil from the generator or household do-it-yourselfers is burned. 2. The heater is designed with a maximum capacity of 0.5 million BTU per hour or less. 3. The combustion gases are vented to the ambient air.		679.23 Photo ☐
H. If used oil is accepted from others or sent off-site to be burned in a space heater, the used oil meets fuel specifications and the marketer requirements in NR 679 subch. H are met.		679.11 Photo ☐

Section 22: Facility Status Evaluation

A. Describe any other activities the facility is conducting.	 Photo ☐

ATTACHMENT D

WDNR Universal Waste Handler Inspection Report

WIR 000 000 356

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Revision: 03/27/2012
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form, used for the inspection of facilities that generate or handle less than 5000 kg of universal waste (hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices), evaluates facility compliance with Wisconsin's Hazardous Waste Management Rules (chapters NR 660-679, Wis. Admin. Code). The Universal waste regulations streamline the requirements for hazardous waste batteries, pesticide, lamps, antifreeze, and some mercury containing devices. Persons treating, disposing, recycling, or otherwise processing universal wastes are subject to applicable hazardous waste regulations.

Section 1: Prohibitions

A. Universal waste is not disposed on-site.	W	673.11(1) Photo☐
B. Universal waste is not diluted or treated on-site. Note: Dilution or treatment does not include: sorting, mixing, discharging, regenerating, or disassembling batteries; removing batteries from consumer products or removing electrolytes; removing thermostat ampules; or, responding to a release of universal waste.	W	673.11(2) Photo☐

Section 2: General Standards

A. Universal waste batteries and thermostats that are broken or show evidence of leakage or spillage are placed in closed, structurally sound containers that are compatible with the waste and are not leaking.	NA	673.13 Photo☐
B. Universal waste pesticides and lamps are placed in closed, structurally sound containers that are compatible with the waste and not leaking.	NA	673.13 Photo☐
C. Sorting, mixing or handling of batteries is only conducted if the battery casing is not breached and remains intact.	NA	673.13(1)(b) Photo☐
D. Wastes generated by handling or cleaning up spills of universal wastes are managed according to hazardous waste or solid waste rules.	Y	673.13 Photo☐
E. If mercury containing ampules are removed from thermostats, the handler meets ALL of the following: 1. Ampules are removed in a manner to prevent breakage. 2. Removal is conducted over a containment device. 3. Spills or leaks are immediately cleaned up. 4. Activity is performed in a well ventilated, monitored environment.	NI	673.13(3)(b) Photo☐
F. Pesticides are placed in a tank that meets NR 665 subch. J requirements, except closure and post closure requirements in NR 665.0197(3) and waste analysis requirements in NR 665.0200.	NA	673.13(2) Photo☐
G. Pesticides are placed in a transport vehicle or vessel that is closed, structurally sound, not leaking and compatible with the waste.	NA	673.13(2) Photo☐
H. All universal wastes are labeled or marked "Waste" or "Used" followed by the specific type of universal waste handled or "Universal Waste".	Y	673.14 Photo☐
I. Containers, tanks, or transport vehicles of recalled pesticides are additionally marked with the label that was on or accompanied the product when it was sold or distributed.	NI	673.14 Photo☐
J. Length of accumulation time is demonstrated by any of the following: 1. Mark or label each container with the earliest date the waste is generated or received. 2. Mark or label the individual item of waste with the date it was generated or received. 3. Maintain an inventory system identifying the date the waste was generated or received. 4. Place the universal waste in a specific accumulation area identified with the earliest date the waste was generated or received. 5. Use some other method that clearly demonstrates the length of accumulation time.	Y	673.15(3) Photo☐
K. Universal waste is accumulated for less than one year from the date generated or received from another handler.	Y	673.15(1) Photo☐

UNIVERSAL WASTE HANDLER INSPECTION REPORT - SMALL QUANITY HANDLER

Section 2: General Standards

L. If universal waste is accumulated beyond one year, the handler can prove that accumulation was necessary to facilitate proper recovery, treatment or disposal.	NA	673.15(2) Photo☐
M. Employees are trained on the proper handling and emergency procedures appropriate to the types of waste handled at the facility.	Y	673.16 Photo☐
N. Handler complies with ALL of the following when a release occurs: 1. Immediately contains the release. 2. Determines if the spill residue is hazardous waste. 3. If hazardous waste, disposes of it as such.	Y	673.17 Photo☐

Section 3: Off-site Shipments

A. Handler sends the waste to a destination facility, foreign destination or another handler.	Y	673.18(1) Photo☐
B. Handler that self-transports complies with ALL of the following: 1. Applicable US DOT regulations in 49 CFR parts 171 to 180 when transporting universal waste that meets the definition of hazardous materials. 2. Immediately contain release and make waste determination on spill residue. 3. If shipped to a foreign destination other than an OECD country, use an EPA acknowledgement of consent.	Y	673.18(2) Photo☐
C. For hazardous materials, the handler packages, labels, marks, placards and prepares the proper shipping papers in accordance with DOT requirements in 49 CFR parts 172 to 180.	NI	673.18(3) Photo☐
D. When shipping to another universal waste handler, the handler has agreed to receive the shipment.	NI	673.18(4) Photo☐
E. If a shipment was rejected, EITHER of the following occurred: 1. The waste was sent back to the originating handler. 2. The originating handler agreed on a destination facility to which to ship the waste.	NI	673.18 Photo☐
F. If a shipment contains hazardous waste, the handler receiving the shipment immediately notifies the Department.	NI	673.18(7) Photo☐
G. Nonhazardous, nonuniversal waste, in a universal waste shipment is managed in compliance with the solid waste requirements.	Y	673.18(8) Photo☐

ATTACHMENT E

WDNR Treatment and Storage Facility Inspection- Tank System

WIR 000 000 356

TREATMENT & STORAGE FACILITY INSPECTION - TANK SYSTEM

Revision: 09/28/2011
WASTE & MATERIALS MANAGEMENT PROGRAM

This Inspection Form Supplement, used in conjunction with the TREATMENT AND STORAGE FACILITY INSPECTION REPORT, is for the inspection of facilities that are accumulating hazardous waste in licensed tank(s) at the facility.

Section 1: Assessment of an Existing Tank System's Integrity

A. If the tank was installed before March 1, 1991and does not meet the secondary containment requirements in Section 3, there is a written assessment, certified by a PE, on file at the facility that determines the tank system is adequately designed and has sufficient structural strength and compatibility with the wastes to be stored or treated so that it will not collapse, rupture or fail. Date of the assessment:_____ If the tank was installed after March 1, 1991, go to Section 2.	NA	664.0191(1) Photo☐
B. The written assessment considers ALL of the following: 1. Design standards for construction of the tank and ancillary equipment. 2. Hazardous characteristics for the wastes handled. 3. Corrosion protection measures. 4. The age of the tank system, either documented or estimated. ____ Results of a leak test, internal inspection or other tank integrity examination.	NA	664.0191(2) Photo☐

Section 2: Design and Installation of a New Tank System

A. If the tank was installed after March 1, 1991, written statements regarding the certification of the design of the tank and the supervison of its installation are kept at the facility. If the tank was installed before March 1, 1991, go to Section 3.	Y	664.0192(7) Photo☐
B. Ancillary equipment is supported and protected against physical damage and excessive stress due to settlement, vibration, expansion or contraction.	Y	664.0192(5) Photo☐
C. Corrosion protection is provided to ensure the integrity of the tank system.	Y	664.0192(6) Photo☐
D. Underground components are completely backfilled with noncorrosive, porous and homogenous material that is compacted so the tank and piping are fully and uniformly supported.	NA	664.0192(3) Photo☐

Section 3: Containment & Detection of Releases

A. The tank system meets BOTH of the following (NR 664.0190(1)). If YES, go to Section 4. 1. Located inside a building with an impermeable floor. 2. Stores or treats hazardous waste that does not contain free liquids.	Y	 Photo☐
B. The secondary containment system meets ALL of the following: 1. Constructed of or lined with materials that are compatible with the wastes placed in the tank. 2. Has sufficient strength and thickness to prevent failure due to pressure gradients, physical contact with the waste, climatic conditions and stresses of daily operation. 3. Placed on a foundation or base that provides support to the secondary containment system and is capable of preventing failure due to settlement, compression or uplift. 4. Sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation.	Y	664.0193(3) Photo☐
C. The leak detection system is designed and operated to detect EITHER of the following: 1. The failure of either the primary or secondary containment structure. 2. The presence of a release within 24 hours or the earliest practicable time if a release cannot be detected within 24 hours.	Y	664.0193(3) Photo☐
D. Spilled waste and accumulated precipitation are removed from the secondary containment system within 24 hours or in a timely manner if removal within 24 hours cannot be accomplished.	Y	664.0193(3)(d) Photo☐

Section 3: Containment & Detection of Releases

E. External liner system meets ALL of the following: 1. Designed or operated to contain 100% of the capacity of the largest tank. 2. Designed or operated to prevent run-on or infiltration of precipitation unless the collection system has capacity to contain precipitation from a 25 year, 24 hour storm. 3. Free of cracks and gaps. 4. Designed and installed to surround the tank completely and cover all surrounding earth likely to come in contact with the waste.	Y	664.0193(5)(a) Photo☐
F. Vault system meets ALL of the following: 1. Designed and operated to contain 100% of the capacity of the largest tank. 2. Designed or operated to prevent run-on or infiltration of precipitation unless the collection system has capacity to contain precipitation from a 25 year, 24 hour storm. 3. Constructed with chemical resistant water stops in place at all joints. 4. Provided with an impermeable interior coating or lining that is compatible with the stored waste and will prevent migration of waste into the concrete. 5. Provided with a means to protect against the formation of and ignition of vapors within the vault if ignitable or reactive waste is stored or treated. 6. Provided with an exterior moisture barrier or otherwise designed or operated to prevent migration of moisture into the vault if the vault is subject to hydraulic pressure.	NA	664.0193(5)(b) Photo☐
G. Double-walled tank meets ALL of the following: 1. Designed as an integral structure so that the outer shell contains any release from the inner tank. 2. If constructed of metal, protected from corrosion of the primary tank interior and of the external surface of the outer shell. 3. Provided with a built-in continuous leak detection system capable of detecting a release within 24 hours or at the earliest practicable time.	NA	664.0193(5)(c) Photo☐
H. The Department approved an equivalent type of secondary containment device if the device is not an external liner, vault system or double-walled tank.	NA	664.0193(4)(d) Photo☐
I. All ancillary equipment has secondary containment (trench, jacketing, double walled piping) except for the following when they are visually inspected for leaks on a daily basis: 1. Aboveground piping, excluding flanges, joints, valves and other connections. 2. Welded flanges, welded joints and welded connections. 3. Sealless or magnetic coupling pumps and sealless valves. 4. Pressurized aboveground piping systems with automatic shut-off devices (excess flow check valves, flow metering shutdown devices, loss of pressure actuated shut-off devices).	Y	664.0193(6) Photo☐
J. If the tank system does not meet the above secondary containment system requirements, the owner or operator has complied with the following: 1. For non-enterable underground tanks, conduct a leak test at least annually. 2. For other than non-enterable underground tanks, conduct a leak test OR have a PE develop a schedule and procedure for assessing the overall condition of the tank system at a frequency to be determined by the operating conditions of the tank system. 3. For ancillary equipment, conduct a leak test or other integrity assessment at least annually. 4. The results of the assessments are maintained in the facility file.	Y	664.0193(9) Photo☐

Section 4: General Operating Requirements

A. Hazardous waste or treatment reagents that are placed into the tank system will not cause the tank, ancillary equipment or containment system to rupture, leak, corrode, or otherwise fail.	Y	664.0194(1) Photo☐

Section 4: General Operating Requirements

B. The following controls and practices are used to prevent spills and overflows from the tank or containment system: 1. Spill prevention controls (check valves or dry disconnect couplings). 2. Overfill prevention controls (level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank). 3. Maintenance of sufficient freeboard in uncovered tanks to prevent overtopping by wave or wind actions or precipitation.	Y	664.0194(2) Photo ☐
C. The facility clearly marks each tank, or records in the operating record, ALL of the following information: 1. A description of the tank contents. 2. The quantity of each hazardous waste received. 3. The date each period of accumulation begins.	Y	668.50(1)(b)2 Photo ☐
D. Hazardous waste in stored in tanks for less than one year.	Y	668.50(2) Photo ☐
E. If waste is stored in tanks for more than one year, the facility can prove that storage was necessary to facilitate proper recovery, treatment or disposal.	NA	668.50(3) Photo ☐

Section 5: Inspections

A. Overfill control equipment (waste-feed cutoff systems, bypass systems and drainage systems) is inspected according to their facility's inspection schedule.	Y	664.0195(1) Photo ☐
B. ALL of the following are inspected at least once each operating day: 1. Aboveground portions of the tank system to detect corrosion or releases of waste. 2. Data gathered from monitoring and leak detection equipment (pressure or temperature gauges, monitoring wells) to ensure that the tank system is operated according to its design. 3. The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, to detect erosion or signs of hazardous waste releases (wet spots, dead vegetation).	Y	664.0195(2) Photo ☐
ND C. Cathodic protection systems are inspected according to BOTH of the following: 1. The proper operation of the cathodic protection system is confirmed within 6 months of the initial installation and annually thereafter. 2. All sources of impressed current are inspected and/or tested at least every other month.	NA	664.0195(3) Photo ☐
D. The inspection results are documented in the operating record.		664.0195(4) Photo ☐

Section 6: Response to Leak and Spills

A. There has been a spill or leak from the tank system or containment system. If NO, go to Section 7.	Y	 Photo ☐
B. The tank system or secondary containment system was removed from service immediately.	Y	664.0196 Photo ☐
C. The flow of hazardous waste into the tank system or secondary containment system was stopped immediately and the system was inspected to determine the cause of the release.	Y	664.0196(1) Photo ☐

Section 6: Response to Leak and Spills

D. If the release was from the tank system, the owner or operator performed BOTH of the following: 1. Removed as much waste as necessary to prevent further releases. 2. Allowed inspection and repair of the tank system within 24 hours after detection or at the earliest practicable time.	Y	664.0196(2)(a) Photo☐
E. If material was released to a secondary containment system, all released material was removed within 24 hours or in a timely manner to prevent harm to human health and the environment.	Y	664.0196(2)(b) Photo☐
F. The owner or operator did ALL of the following: 1. Conduct a visual inspection of the release. 2. Prevent further migration of the spill to soils or surface water. 3. Remove and properly dispose of any visible soil or surface water contamination.	Y	664.0196(3) Photo☐
G. The release was reported to the Department within 24 hours of its detection, except when less than one pound was released and the material was contained and cleaned up immediately.	Y	664.0196(4) Photo☐
H. Written report was submitted to the Department within 30 days of detecting the release.	Y	664.0196(4)(c) Photo☐
I. The following actions were taken: 1. If the integrity of the tank system was not damaged, the system was returned to service after cleanup and repairs. 2. If the leak was from the tank system into secondary containment, the system was repaired before the tank was returned to service. 3. If the leak was from a component that did not have secondary containment, either secondary containment was provided or repairs were made if the component can be visually inspected.	Y	664.0196(5) Photo☐
J. If major repairs were made to the tank system, a PE certification was obtained and submitted to the Department within 7 days of returning the tank system to use.	Y	664.0196(6) Photo☐

Section 7: Special Requirements for Ignitable, Reactive or Incompatible Wastes

A. Ignitable, reactive or incompatible waste is stored or treated in tanks. If NO, go to Section 8.	NA	 Photo☐
B. The waste is treated or mixed before or immediately after placed in a tank system so that ALL of the following apply: 1. Extreme heat, pressure, fire, explosions or reactions are not produced. 2. Uncontrolled toxic or flammable fumes or gases are not produced. 3. The structural integrity of the tank system is not damaged. 4. Other means are taken so human health or the environment is not threatened. 5. The waste no longer meets the definition of ignitable or reactive waste.		664.0198(1)(a) Photo☐
C. Ignitable or reactive waste is stored or treated in a way to protect it from any material or conditions that may cause the waste to ignite or react.		664.0198(1)(b) Photo☐
D. The tank system is only used to treat or store ignitable or reactive waste during an emergency.		664.0198(1)(c) Photo☐
E. Buffer zone requirements between the tanks and any public ways or adjoining property lines are in compliance with the NFPA standards in the Flammable and Combustible Liquids Code.		664.0198(2) Photo☐

Section 7: Special Requirements for Ignitable, Reactive or Incompatible Wastes

F. The tank system is decontaminated before adding an incompatible waste.		664.0199(2) Photo☐

Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

A. Hazardous waste tanks are excluded from subch. CC requirements because of BOTH of the following (NR 664.1082(3)(a)): 1. The average VO concentration at the point of origination is <500 ppmw for all hazardous waste entering the tank. 2. The initial determination of the average VO concentration is reviewed and updated at least once every 12 months.	W	Photo☐
B. Waste determinations for excluded tanks are made according to ALL of the following: 1. The initial determination of the average VO concentration for the waste stream was made before the material was placed in the tank. 2. A new waste determination is performed whenever changes to the source generating the waste stream likely causes the average VO concentration to increase to >= 500 ppmw. 3. The average VO concentration is determined by direct measurement or by knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	NA	664.1083(1) Photo☐
C. For each waste determination, the date, time and location of each waste sample collected are maintained in the facility records.	Y	664.1089(6)(a) Photo☐
D. Tanks are excluded from CC requirements because they are used to store or treat hazardous waste from organic peroxide manufacturing processes (NR 664.1080(4)). Note: Certain records are to be maintained. Refer to NR 664.1089(9) for more information.	NA	Photo☐
E. Hazardous waste tanks are excluded from CC requirements because of the following (NR 664.1080(2)): 1. Waste is no longer added to the tank and closure has been implemented or completed. 2. The tank is used solely to store or treat on-site remediation wastes generated through NR 700 or RCRA corrective action activities OR radioactive mixed wastes in accordance with NRC requirements. 3.The tank is equipped with air emission controls operating in accordance with the Clean Air Act requirements AND the facility records include a certification signed by the owner or operator and the specific air program compliance requirements for the unit. 4. If an enclosure is used as the air emission control, the enclosure is in compliance with the enclosure and control device requirements unless the tank bulk feeds to an incinerator. 5. The tank has a process vent subject to Subch. AA requirements.	NA	Photo☐
F. Hazardous waste tanks are excluded from CC regulation because of any of the following (NR 664.1082(3)): 1. The organic content of all waste entering the tank has been reduced by an organic destruction or removal process described in NR 664.1082(3). 2. The hazardous organic constituents placed in the tank are treated to meet LDR standards. 3. The tank is in an enclosure that vents to a control device and bulk feeds to an incinerator.	NA	Photo☐
G. All tanks are excluded from subch. CC requirements. If YES, go to Section 9.	NA	Photo☐

Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

H. The maximum organic vapor pressure of the hazardous waste managed in a fixed roof tank is less than the maximum organic vapor pressure limit for the tank's design capacity category as follows (NR 664.1084(2)(a)). If NO, go to Question ZA. 1. Tank design capacity is >= 40,000 gallons and the maximum organic vapor pressure limit for the tank is 0.75 psi (5.2 kPa). 2. Tank design capacity is between 20,000 to 40,000 gallons and the maximum organic vapor pressure limit for the tank is 4.0 psi (27.6 kPa). 3. Tank design capacity is <20,000 gallons and the maximum organic vapor pressure limit for the tank is 11.1 psi (76.6 kPa).	Y	664.1084(2)(a) Photo ☐
I. The maximum organic vapor pressure of the hazardous waste managed in the tank is determined according to ALL of the following: 1. The maximum organic vapor pressure is determined before the waste is first placed in the tank. 2. A new determination is performed when changes to the hazardous waste could cause the maximum organic vapor pressure to increase to or exceed the maximum vapor pressure for the tank design capacity. 3. The maximum organic vapor pressure was determined by either direct measurement or knowledge. Note: See NR 665.1084(1)(c) for direct measurement procedures and NR 665.1084(1)(d) for using knowledge.	Y	664.1084(3)(a) Photo ☐
J. If the maximum organic vapor pressure was determined by direct measurement, ALL of the following information is maintained in the facility records: 1. The date and time of sample collection. 2. The analytical method and results.	Y	664.1089(2)(b) Photo ☐
K. If the maximum organic vapor pressure was determined by direct measurement, a copy of the written sampling plan is on file.	Y	664.1083(3)(c) Photo ☐
L. If the maximum organic vapor pressure was determined by knowledge, the facility records include the information used as the basis for knowing that the maximum organic vapor pressure limit of the hazardous waste is less than the maximum vapor pressure limit listed for the applicable tank design capacity category.	Y	664.1083(3)(d) Photo ☐
M. The tank is equipped with a fixed roof and closure devices to form a continuous barrier over the entire surface area of the hazardous waste in the tank.	Y	664.1084(3)(b) Photo ☐
N. The fixed roof is EITHER of the following: 1. A separate cover installed on the tank (a removable cover mounted on an open-top tank). 2. An integral part of the tank structural design (horizontal cylindrical tank equipped with a hatch).	Y	664.1084(3)(b)1 Photo ☐
O. The fixed roof is installed in a manner so there are no cracks, holes, gaps or other open spaces visible between the roof section joints or between the interface of the roof edge and tank wall.	Y	664.1084(3)(b)2 Photo ☐
P. Each opening in the fixed roof and any manifold system for the fixed roof is EITHER of the following: 1. Equipped with a closure device that, when closed, has no visible cracks, holes, gaps or other open spaces. 2. Connected by a closed-vent system to a control device that is operating whenever hazardous waste is managed in the tank, except during routine inspections and maintenance.	Y	664.1084(3)(b)3 Photo ☐
Q. The closure devices and fixed roof are made of materials that minimize the release of hazardous waste to the atmosphere and maintain the integrity of the roof and closure devices.	Y	664.1084(3)(b)4 Photo ☐

Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

R. Each closure device is secured in the closed position and the fixed roof installed except when inspections and maintenance are performed or tank sludge is removed.	Y	664.1084(3)(c)1 Photo ☐
S. If the tank is equipped with a pressure relief device which vents to the atmosphere, the pressure relief device is operated according to BOTH of the following: 1. There are no detectable organic emissions (<500 ppmv) when the pressure relief device is closed. 2. The pressure relief device is only opened during normal operations to maintain the tank internal pressure according to tank design specifications.	Y	664.1084(3)(c)2 Photo ☐
T. Safety devices are only opened when necessary to avoid unsafe conditions.	Y	664.1084(3)(c)3 Photo ☐
U. The fixed roof and closure devices are visually inspected at least once every year for the following defects, at a minimum, that could result in air pollutant emissions: 1. Visible cracks, holes or gaps in the roof sections or between the roof and tank wall. 2. Damaged seals or gaskets on closure devices. 3. Broken or missing hatches, access covers, caps or other closure devices.	Y	664.1084(3)(d) Photo ☐
V. If inspections are conducted at intervals longer than one year, the fixed roof or closure device has been designated as "unsafe to inspect and monitor".	NA	664.1084(12) Photo ☐
W. If the fixed roof or closure device has been designated as "unsafe to inspect and monitor", ALL of the following information is recorded in a log: 1. The identification numbers for the roof or closure device with covers that are designated as "unsafe to inspect and monitor". 2. A written explanation stating the reasons why the roof or closure device is unsafe to visually inspect or monitored. 3. A written plan and schedule for inspecting and monitoring the roof or closure device as frequently as practical when a worker can gain safe access.	NA	664.1089(7) Photo ☐
X. First efforts of repair are made within 5 calendar days of detection and completed no later than 45 calendar days of detection unless repair is delayed.	NA	664.1084(11) Photo ☐
Y. Repair is delayed until the next time the process or unit generating the waste stops operation because the tank must be emptied for repair and there is no alternate tank capacity.	NA	664.1084(1) Photo ☐
Z. Inspection records are maintained for at least 3 years and include ALL of the following: 1. Tank ID#. 2. Date of inspection. 3. Location and description of the defect. 4. Date the problem was detected and the corrective action taken. 5. The reason repair was delayed and the date of completion, if applicable.	Y	664.1084(3)(d)4 Photo ☐
ZA. The facility manages hazardous waste in any of the following tanks (NR 664.1084(2)(b)). If YES, complete the Subch. CC Level 2 and 3 Standards for Containers and Tanks inspection form. 1. Hazardous waste in the tank has a maximum organic vapor pressure greater or equal to the maximum limit for the tank's design capacity category as stated in Question H. 2. Tank is used for a waste stabilization process. 3. Hazardous waste in the tank is heated to a temperature greater than the temperature at which the vapor pressure was determined. 4. Tank has a fixed roof with an internal floating roof. 5. Tank has an external floating roof. 6. Tank is subject to subch. CC and vented to a control device. 7. Tank is a pressure tank. 8. Tank is located inside an enclosure.	NA	664.1090(2) Photo ☐

Section 8: Subchapter CC Level 1 Standards - Fixed Roof Tanks

ZB. If the facility managed hazardous waste with an average VO concentration >500 ppmw or without adequate reduction of the organic content by an organic destruction or removal process in a tank exempt from subch. CC level 1 standards, a written report was submitted to the department within 15 calendar days of the time the owner or operator becomes aware of the occurence which includes ALL of the following information: 1. The facility name, address and EPA identification number. 2. A description of the noncompliance event. 3. The cause and dates of the noncompliance. 4. The actions taken to correct the noncompliance. 5. The actions taken to prevent the reoccurrence of the noncompliance.	NI	664.1090(1) Photo☐
ZC. If hazardous waste with an organic vapor pressure exceeding the maximum organic vapor pressure limit for the tank design capacity has been placed in a tank with level 1 standards, a written notification was submitted to the department within 15 calendar days of the time the owner or operator becomes aware of the occurrence that contains, at a minimum, the following information: 1. The facility name, address and EPA identification number. 2. A description of the noncompliance event. 3. The cause and dates of the noncompliance. 4. The actions taken to correct the noncompliance. 5. The actions taken to prevent the reoccurrence of the noncompliance.	NI	664.1090(2) Photo☐
ZD. If hazardous waste is transferred from one tank to another tank subject to level 1 or level 2 standards, continuous hard-piping or another closed system that does not allow exposure of hazardous waste to the atmosphere is used, except under any of the following conditions: 1. The average VO concentration at the point of waste origination is <500 ppmw and is determined at least once every 12 months. 2. Hazardous waste has been treated to a specified concentration by an organic or biological destruction or removal process. 3. The organic constituents of the hazardous waste placed in the tank are treated to meet the LDR treatment standards.	NI	664.1084(10) Photo☐

Section 9: Facility Status Evaluation

A. The facility conducts hazardous waste activities other than tank storage or treatment. If YES, complete the appropriate inspection forms (container storage, universal waste, used oil, etc.)		 Photo☐

ATTACHMENT F

MPI Post-Inspection Log

WID 000 000 356

Attachment F- MPI Post-Inspection Documentation Log MID048989891

Inspection Date: February 14, 2013

Post-Inspection Submittal: February 15, 2013; March 1, 3, 4, 5, 6, and 8, 2013; and December 9 and 10, 2014.

Description
Att1A Powder Results- Retorted Powder Laboratory Analysis-
Att1B Endcap- Endcaps Laboratory Analysis
Att1C Glass Results
Att1D Ash Results
Att1E Ash Profile
Att1F Glass Profile
Att1G Powder Profile
Att2 RCRA Authorization Letter
Att4A 2011 Tank Assessment
Att4B 2011 Tank Assessment
Att5B Incident Report (7-25-12)
Att8A Example 1HazWasManifest
Att8BExample 2HazWasManifest
Att11 4Q 2012 Spill Log Submittal
Att12 2012 Soil Sampling Results Drawing
Att13A WMMWI Storm Water Sampling
Att14 Weekly Facility Vent Readings
Att15 Daily Mercury Vapor Readings
Att16 Retort Oil Container Pumping Log
Att17A Subpart BB Compliance Document
Att17B Subpart CC Compliance Document
Att18 Daily Inspections
Att19 Integrated Contingency Plan
Att 20 Training Program
Att 21 2013 WMMWI Financial Assurance
Att 22 WMMWI Mercury MSDS
Facility Inspection Checklist
App 19 Preparedness and Prevention
Copy of Monthly Emergency Equipment
EMT Certification (2014-2015)
Local Arrangements Letter 2/28/14
Manifest #1 Customer
Manifest #2 Customer
Manifest #3 Customer
Preparedness Prevention Language
Rejection#1
Rejection#2
Rejection#3
WDNR 9-25-14 Inspection NON

Description
WDNR 9-25-14 Inspection RTC
2011 Regulatory Review Sign-In Sheets
2012 Regulatory Refresher Sign-In Sheets
2013 Regulatory Refresher Sign-In Sheets
2013 Session 1 Bryant Certificate
2013 Session 2 Kluetzman Certificate
2013 Session 3 Carruth Certificate
Training Matrix and Training Module Topics
Outline of General RCRA Training Topics
WMMWI Job Descriptions